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ABSTRACT

Seven policy papers identify and address several issues pertaining to linkages between Comprehensive Employment and Training Act (CETA) programs and vocational education, special education, and vocational rehabilitation. The first paper examines barriers encountered in administration of federal legislation dealing with education and employment of handicapped persons, gives an overview of two critical national problems, and identifies options for addressing the problems and barriers. The second paper emphasizes the role of state planning in cooperative linkages. Alternative funding approaches for linkages are discussed in the third paper. The fourth paper focuses on implementing individualized planning requirements within education and employment and training programs. The fifth paper examines the basis for personnel preparation in organizations providing vocational services to special needs students. The possibility of interagency cooperative activities and suggested competencies for special needs vocational trainers are examined. Two hypothetical approaches are proposed to increase agency interaction through training of staff from all agencies. The sixth paper identifies problems of implementing, operating, and maintaining CETA/vocational education programs for special needs clients and the use of evaluation to facilitate program development and maintenance. The seventh paper suggests research and evaluation needs in the human resource development area and a shape for further program development. (YLB)

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CETA/Vocational Education, Special Education and Vocational Rehabilitation Linkages

Policy Paper Series: Document 5

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FOREWORD

The mid and late 1970's were characterized by the enactment of new, major legislative mandates in the education and employment of handicapped individuals. Public Law 94-142 and Sections 503 and 504 of the Rehabilitation Act of 1973 have had profound effects upon educators and employers. In response to these mandates, a number of diverse programming approaches and policies have been implemented by vocational and special educators, and vocational rehabilitation personnel at the state and local levels.

The Leadership Training Institute (LTI)/Vocational and Special Education was established to assist state leadership personnel in improving and expanding vocational education opportunities for handicapped learners. The project is supported by a grant from the Division of Personnel Preparation, Office of Special Education, U.S. Department of Education. Through the project, emerging legislative issues and priorities pertaining to vocational education for handicapped learners are addressed in regional leadership training institutes. By March, 1981, eight institutes were conducted throughout the nation addressing a variety of key issues.

This series of policy papers on CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages is a product of the fifth Leadership Training Institute which was held in Hartford, Connecticut, on May 4-6, 1980. A comprehensive literature review and a small scale needs assessment survey identified a number of major concerns in this area such as state planning, program improvement, and program evaluation.

Several recognized leaders in the area of CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages were invited to prepare papers addressing each of the major concerns that had been identified. It is a pleasure to share these insightful and cogent policy papers through the production of this volume. The LTI is greatly indebted to the authors for their excellent contributions: Dr. Carole M. Johnson, Consultant on Education and Employment; Dr. Marc E. Hull, Vermont State Education Department; Dr. Susan Hasazi, University of Vermont; Sandra Dragon and John Hanzl, Vermont CETO; Carol A. Kochhor, George Washington University; William Eddy, U.S. Department of Education, Office for Civil Rights; Barbara Dunn, Research Specialist, Youthwork, Inc.; Evelyn Ganzglass, Director, CETA/Education Consortium; Dr. James M. Brown and Terrence F. Kayser, Minnesota Research and Development Center for Vocational Education, University of Minnesota; Dr. George A. Korn, Massachusetts Department of Education; and Gregory Wurzburg, Director of Operational Research and Policy, Youthwork, Inc. The reviewers of this draft report provided numerous helpful and insightful comments:

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PREFACE

CETA is becoming an increasingly significant service provider for special needs persons. It provides training and employment programs to people who meet the eligibility criteria for individual programs. CETA participants must be economically disadvantaged, unemployed, underemployed, or handicapped. The prime sponsors or local authorities offer several programs which may include classroom training, on-the-job training, work experience, and other employment-related and supportive services.

Vocational education, special education, and vocational rehabilitation provide similar kinds of programs and services to special needs learners. In a period of declining resources for social programs it is highly advantageous for these agencies to coordinate their resources and efforts with CETA. Linkages between the agencies and CETA can ensure that special needs learners receive appropriate vocational instruction and related services. Without linkages, these agencies may be providing duplicative services and disjointed programs.

The CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages Policy Paper Series is intended to identify and address several of the issues that pertain to linkages between CETA and these agencies. The topics and issues that are addressed include:

- Legislative Issues Concerning CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages.
- State Planning for CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages.

- Funding CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages.
- Individualized Planning and Coordination.
- Personnel Development Policies and Practices: Enhancing Interagency Service of Special Needs Populations.
- Program Evaluation in CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages.
- Program Improvement and Research Needs of CETA, Vocational Education, Special Education, and Vocational Rehabilitation.

These titles do not reflect an all inclusive list of topics relating to CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages. However, they do provide a basis for examining some of the significant issues and concerns that presently exist.

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Legislative Issues Concerning CETA/Vocational Education, Special Education, and Vocational Rehabilitation

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In 1982 two major pieces of federal legislation are scheduled for reauthorization by the U.S. Congress - the Vocational Education Act (VEA) of 1963, as amended by P.L. 94-482 and the Comprehensive Employment and Training Act of 1974. In addition, the Education for all Handicapped Children Act of 1975 (P.L. 94-142) and the Vocational Rehabilitation Act of 1973 (P.L. 93-112) are expected to receive attention from the 97th and 98th Congresses. These pieces of legislation singularly and collectively, afford both opportunities and obstacles for the education and employment of handicapped persons.

The opportunities result from increased accessibility for handicapped persons mandated in each act and broader provision of services to these individuals. The obstacles are essentially administrative. Some creative administrators in education, rehabilitation, and prime sponsorships have worked together to overcome the barriers unintentionally erected among their programs by the legislation. Others have either been unable or unwilling to do so.

This paper will examine a number of the barriers encountered in administration of these acts, briefly describe two national problems which are becoming more critical, and identify several options for addressing the problems and barriers described. Because neither the Vocational Education Act nor CETA were designed solely to serve handicapped individuals, the barriers and recommendations which follow do not necessarily pertain solely to this population.

BARRIERS TO COOPERATION

Differences in subpopulation definitions contained in the various pieces of federal legislation often make coordination of services difficult at best. Differences in ages of eligible recipients also cause considerable administrative difficulties.

The term "handicapped" is defined by federal legislation as:

- Education of Handicapped Children Act (121a.5)

  The term "handicapped children" means those children evaluated in accordance with Section 121.a.530 to 121a.535 as being: mentally retarded, hard of hearing, deaf, speech impaired, visually handicapped, seriously emotionally disturbed, orthopedically impaired, other health impaired, deaf-blind, multi-handicapped, and specific learning disabled who because of those impairments need special education and related services.

- Vocational Rehabilitation and Independent Living Rehabilitation Program (Section 1361.1)

  "Handicapped individual" except in Section 1361.16c, 1361.51e, 1361.52g and 1362.7 means an individual: (a) who has a physical or mental disability which for that individual constitutes or results in a substantial handicap to employment; and (b) who can reasonably be expected to benefit in terms of employability from the provision of rehabilitation services, or for whom an

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extended evaluation of vocational rehabilitation potential is necessary to determine whether he or she might reasonably be expected to benefit in terms of employability from the provision of vocational rehabilitation services; "Handicapped individual," for purposes of Sections 1361.16(c), 1361.51(e), 1361.52(g), and 1362.7, means an individual: (a) who has a physical or mental impairment which substantially limits one or more major life activities; (b) who has a record of such an impairment; or (c) who is regarded as having such an impairment.

- Vocational Education Amendments of 1976 (Section 195)

  (7) The term "handicapped", when applied to persons, means persons who are mentally retarded, hard of hearing, deaf, speech impaired, visually handicapped, seriously emotionally disturbed, crippled, or other health impaired persons who by reason thereof require special education and related services, and who, because of their handicapping condition, cannot succeed in the regular vocational education program without special education assistance or who require a modified vocational education program.

- Comprehensive Employment and Training Act Amendments of 1978 (Section 675.4)

  The term "handicapped" means any person who has a mental or physical disability which constitutes a substantial barrier to employment and can benefit from CETA services provided, as determined by the prime sponsor. (Handicapped individuals are not required to meet an income level requirement to be considered economically disadvantaged provided their handicap presents a substantial barrier to employment)

These definitional differences mean that some handicapped individuals, particularly those of secondary school age, may be counted for P.L. 94-142 and CETA supported programs but not for VEA programs because they do not "require special education and related services" in order to succeed in regular vocational education. Others may not be allowed to participate in CETA programs because the prime sponsor does not perceive that they can benefit from CETA services.

Further confusing the issue for administrators is Section 504 of the Rehabilitation Act which prohibits discrimination on the basis of handicap. If they admit students to programs based on the Rehabilitation Act definition, then programmatic expenditures (under VEA, P.L. 94-142, or CETA) may be disallowed because the person does not meet the eligibility requirements of these program laws.

Participation in the federally supported various programs is also governed by the individuals' ages. In CETA programs, depending on the Title under which the program is funded, individuals may be 14 and older. Vocational education students may be 16 and over in programs supported by the VEA. Special education students must be 3 to 21. Rehabilitation clients may be 14 or older but more and more frequently, services are being limited to individuals who have left secondary school programs.

Clearly, the logical approach to providing education and employment preparation for students ages 14 to 16 would be with funds provided by CETA (Title IV) and P.L. 94-142; for those 16 to 21 (or secondary school leaving age) by VEA, CETA, and P.L. 94-142; for those 21 and above through VEA, CETA, and the Rehabilitation Act. Rather than targeting resources on individuals, program funds could be allocated to providing services such as assessment, counseling, skill training, and others according to authorizing legislation and amount of funds available. Several areas, such as Oklahoma City, are following this or a similar procedure. The following section, on coordination, indicates why this practice is not followed frequently.

Coordination

Partial duplication of goals and populations served by the Vocational Education Act and the Comprehensive Employment and Training Act resulted in a clear legislative mandate for coordination. The mandate for coordination applies to all levels of government (federal, state, and local) and cuts across several functions (planning, program administration, and research and demonstration). Both CETA and VEA specify mandates for coordination at the national level encompassing three functions.

State level coordination is required under both CETA and VEA, and specific channels for interaction are described. Collaboration is encouraged under CETA through the set-asides that either require funds to be spent by vocational education agencies or allow funds to be used for coordination of vocational education and CETA programs. At the state level, coordination requirements contained in CETA and VEA are defined in terms of planning and program administration. At the local level coordination requirements are essentially of a planning nature.

Public Law 94-142 does not require significant coordination efforts at any level other than review of state plans by the administrative agents at the state level of vocational education and special education as well as membership on State Advisory Councils by a representative of handicapped persons. Rehabilitation programs, by their design as procurers as well as providers of services, refer clients to both CETA and VEA programs but actual program coordination is minimal.

The coordination requirements and authorizations in VEA and CETA programs do not make specific reference to programs for handicapped participants. The assumption is that these requirements and authorities apply to all programs and participants and that, therefore, coordinated programs will be provided for all participants including those who are handicapped.

Some evidence exists suggesting that coordinated programs involving handicapped participants are evolving. The majority appear to be the result of national research and development support of 21 projects under CETA Title III (DOL NPSPS Report, 1979); and approximately the same number under Title IV. A study of exemplary local level Vocational Education/CETA Coordination Activities supported by programs of national significance under VEA revealed that 10 programs of the 111 cited provided special efforts or a focus for handicapped enrollees (Bowers, Oglesby, & Whitney, 1980).

If, as Stevens (1979) suggests "current ties (between programs) are usually informal, unstable, and less than satisfactory in terms of mutual program objectives" for general CETA/vocational education coordination efforts, can this be any less true for handicapped participants in regular or separate programs? The predominately "informal, unstable, and less than satisfactory" arrangements result in many cases from the significant differences between the programs. These differences contribute to the erection of barriers to coordination. Several of the major differences include:

- Populations served. Vocational education, whether supported by VEA or not, serves a wide range of individuals age 16 and older. Some are handicapped, others are economically or educationally disadvantaged, and still others are neither. CETA serves primarily economically disadvantaged individuals with handicapped individuals subsumed under that classification. Some non-disadvantaged youth are served under Title IV. These differences mean that the vocational education system is required to serve a wider audience than is CETA. The pressures on administrators of both systems are enormous, with those on the vocational administrator potentially and probably being more diversified. Both systems are constantly pressured to better serve more people.

- Governance. Vocational education programs are operated under the auspices of state and local education agencies with the state board for vocational education determining the distribution of federal funds in accordance with the formula requirements prescribed in VEA and its accompanying regulations.

CETA programs are operated under the direction of prime sponsors in states and localities and are funded directly by the Department of Labor. According to Stevens (1979), in 1979 prime sponsors included "66 cities; 180 counties; 144 consortia (combination of city and/or county government); 49 states, and territories; 20 cities, counties, or rural areas operating under exceptional circumstances, or as concentrated employment programs, and 170 Native American Organizations" (p. 4).

CETA, then, is essentially a function of local government while vocational education, at the local level, operates primarily as a function of local substantially autonomous school boards (Whaley, 1980). Differences between school boards, prime sponsors, governors, and state boards of education may be considerable with respect to commitment to education, concern for CETA eligible populations, political and community pressures, and philosophies toward the two systems. Further, local school boards are subject to numerous state education laws, regulations, and policy directives which may not apply to prime sponsor programs. Similarly, prime sponsors are subject to numerous Department of Labor regulations and policy directives which do not apply to LEAs.

- Fund Distribution

  VEA funds are distributed to states based on population size, age distributions, and average per capita income. A dollar for dollar match is required for Subparts 2 and 3. Subpart 4 (Special Programs for the Disadvantaged) are 100% federally funded. Set-aside funds for the handicapped and disadvantaged may only be used to pay 50% of the excess costs for educating those students in regular programs or 100% of the cost for separate programs. Funds are distributed within the states according to suballocation formulas which give priority to economically depressed areas or areas with high rates of unemployment and areas proposing programs new to the area. The two most important factors include relative financial ability to pay and relative number or concentration of low income families or individuals.

Distribution of CETA funds is more complex with the factors generally being the relative number of unemployed persons, relative number of persons with annual incomes below the Bureau of Labor Statistics lower-income-level, and the relative number of persons residing in areas of substantial unemployment. However, terms such as "relative numbers" are defined differently in each title.

The major problem with regard to coordination and fund distribution is that vocational education is forward funded while CETA is not (HEW/DOL, 1980). The forward funding issue is less severe for Title II programs for which prime sponsors receive estimated funding levels for the next year. It is a critical problem for several programs (Whaley, 1980).

- Planning cycles

  VEA state and local plans are geared to a July 1-June 30 planning and budget cycle. CETA planning is geared to the October 1 - September 30 federal budget cycle. Because of their annual budget authority, CETA administrators are forced into a short-term quick turn around planning mode (Education Policy Research Institute, in press).

  The school-CETA planning cycle differences are a particular problem in Title IV programs. Schools have great difficulty in planning, staffing, and supplying materials for new or continued programs a few days before school opens or two to four months into a semester. As Drewes (1980) notes "This incongruity makes coordinated planning difficult and mitigates against administrative alignment of the two systems (p. 77).

Infrastructure Differences

Vocational education has a well defined (though in some cases out of date) infrastructure of secondary and postsecondary facilities, equipment, curricula, and personnel. It also has an R & D network which includes personnel development, curriculum development, and applied research, for improving and upgrading the system, when funds are available to do so.

The CETA system does not have a similar infrastructure. Services are procured through program operators who either provide services themselves or subcontract with others, such as secondary or postsecondary education institutions, community organizations, or employers. Substantial funding is available for R & D activities but a similar R & D network does not formally exist.

These differences lend themselves both to real and perceived differences in program quality. These differences when coupled with different perceptions about CETA eligible individuals, funding levels, and perceptions of expertise in preparing people for work often hamper communications (or negotiations) between the systems.

Despite these differences, many vocational and CETA administrators have been able to develop positive working relationships. The attitudinal barriers or "turf" issues which have fueled the debate and feuding between the two systems for almost twenty years have begun to erode. The availability of Youth Employment Training Programs (YETP) and 6% set-asides in CETA have caused many financially pressed school administrators to view CETA more favorably. Greater access by CETA program operators to vocational facilities, equipment, and instructors as well as the positive effects on program participants (particularly those enrolled in off-time and open- entry open-exit programs) has also contributed to improved relationships. Within each system administrators are beginning to perceive that each can make a significant contribution to the total work preparation of CETA eligible individuals including those who are handicapped. They are also beginning to perceive that parcelling out delivery of services according to the real strengths within each system leads to both more efficient and more effective services to individuals.

EMERGING PROBLEMS

For handicapped individuals, coordination among programs operated under VEA, EHA, CETA, and the Rehabilitation Act can result in

- greater availability of work preparation opportunities
- higher quality programs
- more efficiently operated programs
- more cost-effective programs and ultimately jobs for a larger number of under- and unemployed individuals.

Coordination between VEA and CETA can result in similar benefits for additional subpopulations. It is clear that the movement toward improved coordination is underway, albeit slowly. Reduced federal authorization and appropriation levels may serve to further stimulate this movement. Underlying issues of coordination and funding, however, is a much more fundamental question. What kinds of programs, and therefore what kinds of jobs, are available for handicapped and nonhandicapped present and future workers? The answers to this question are intimately related to two increasingly serious national problems:

- severe shortages of skilled workers, and
- technological illiteracy in youth and adult populations.

These two problems are becoming more evident even in the current "sluggish" economy. They can be expected to increase as factors which contribute to economic vitality such as increased productivity are addressed by government and private industry. Changes in industrial tax policy, whether in terms of accelerated depreciation allowances or tax credits for R & D or both, and increased defense spending will lead to changes in the workplace and human resource development needs. Missiles and industrial robots require skilled designers, builders, operators, and maintainers. In many cases these skilled workers are not available. For example, today 60,000 journeyman machinists are needed but are unavailable (Goldwater, 1981). By 1990, 210,000 will be needed but only 5% of that number is projected to be available based on current rates of preparation (Campbell, 1981).

Vocational education enrolled only 11,383 persons in machine tool operations programs in 1978-79 (Wulfsberg, 1980). Similar shortages and short falls in preparation of workers are projected in numerous other critical skill areas including tool and die making, drafting, industrial computer analysis, electronics, and secretarial (particularly word processing). These are not occupations which lend themselves readily to short-term training or on-the-job training for individuals who do not have prior or concurrent related instruction. Further, many of these occupations are becoming more technologically demanding as computerization is brought to bear on the work to be performed. However, while a large number of these skilled worker domains are jobs for which vocational education provides training enrollments, they have shown minimal growth between 1972 and 1979 (Wulfsberg and Golladay, 1980). Examples of these predominately technical and trade and industrial program areas include: electronic technology, mechanical technology, industrial technology, and metalworking operations.

At the same time the country is experiencing skilled worker shortages, advances in technology are changing the skill requirements of many jobs and leading to the creation of new jobs. Some current job holders are being displaced by technological changes, foreign competition, production slowdowns, and industrial efficiencies. At the present time, one out of thirteen U.S workers is unemployed defined by the Bureau of Labor

Statistics as all those not working during a survey week but who have sought work during the previous four weeks and are available for work including all those who were laid off and waiting to be called back or waiting to report to a new job within 30 days (TIME, 1981). If 1976 statistics can be applied to today's employment outlook, 60% of the adult disabled population is not employed (Levitan & Taggart, 1976). Some of these disabled people fall within the unemployed statistics of the Bureau of Labor Statistics, others may not because they have stopped looking for work or other reasons. There are, then a large number of individuals who want to work and a large number of jobs available. Therefore one may conclude that the skills of the former do not, in many cases, match the skill requirements of the latter. Moreover, projected changes, especially increases in the application of emerging technologies and further declines in unskilled and semi-skilled occupations (as projected for the 1980's), can be expected to further increase the distance between requirements for available jobs and the least skilled job seekers.

This distance, while not solely attributable to current work preparation programs, may be exacerbated by continued reliance within both CETA and VEA supported programs on the work experience method of training the less skilled for work. In general, the purposes of these programs with the exception of cooperative vocational education which has other purposes as primary, are to teach employability skills (work habits and attitudes), provide a work resume, and provide participants with successful experiences. Clearly, all these factors contribute to worker success. However, punctuality, six months work experience, and a minimum of self-confidence do not enable a handicapped individual or anyone else to obtain a job as a tool and die maker or for many of the other jobs available today and projected for the future.

RECOMMENDATIONS

1. Prior to the reauthorization of VEA and CETA a National Employment Policy should be clearly articulated. Such a policy statement should be made after a careful review of the current and projected needs of business and industry; the needs of present and potential youth and adult workers, including those who are handicapped or disadvantaged; and existing federal labor, education, and training laws and regulations and the strengths and weaknesses of current work preparation programs. Relationships and responsibilities among local, state, and federal governments and the private sector with regard to labor force preparation should also be carefully examined. The resulting National Employment Policy should form the conceptual framework around which employment preparation legislation is developed.

2. Increased attention should be paid at the local, state, and federal levels on updating work preparation personnel and curricula; exploring low cost learning environment alternatives; exploring alternatives for equipment upgrading and modernization in vocational facilities; and forging stronger ties with business and industry. Particular attention should be paid to those occupational specialties in which technology has or is beginning to change the nature of the jobs for which training is to be provided.

3. If retained as separate programs, CETA and VEA should be funded on the same budget cycle.

4. If separate jurisdictional authorities are to be continued in the reauthorization of VEA, CETA, P.L. 94-142, and the Rehabilitation Act, the following recommendations are offerred:

- Reexamine the basic premises under which the programs are authorized in light of the needs of the 1980s and 1990s.
- Articulate the premises which are sound for the next decade and reformulate the acts to eliminate those aspects of current law which have hindered achievement of their purposes.
- Give stronger emphasis to the needs of adults as displaced workers, and seekers of job upgrading, retraining, and change. This should be done without reference to a particular institutional service provider.
- Allow greater flexibility for state and local governance bodies.
- Employ standard definitions for subpopulations.
- Expand current R & D networks and increase emphasis on updating curricula and personnel with regard to occupational standards and practices. Continue or increase current efforts in occupational forecasting at all levels, and increase the dissemination of this information in a usable and readable form to program decision makers.
- Increase incentives to state and local governance bodies to respond to changes in the occupational mix in their areas of jurisdiction.
- Significantly increase incentives for collaboration with the private sector.
- Continue or increase provisions for supportive services to those most in need.

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State Planning for CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages

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Employment can contribute measurably to the quality of an individual's life as well as provide a means for securing many of life's essential commodities - food, shelter, clothing, transportation, goods, and services. Consequently, opportunities to engage in meaningful and gainful employment are vital to a majority of Americans, including the nation's 30 million citizens who are handicapped.

Handicapped persons are beginning to speak out in increasing numbers about the importance of employment in their lives. Dr. Frank Bowe, the founder of the American Coalition of Citizens with Disabilities, aptly summarizes the thoughts of disabled persons in his book, Handicapping America (1978):

> Employment can provide deep personal satisfaction and feelings of self-worth, daily stimulation and challenge, monetary compensation, important fringe benefits, social interaction with a wide variety of people, the opportunity to produce and to create, recreation and enjoyment, and a constant impetus to further personal and professional growth. Enforced idleness, by contrast, denies feelings of self-worth, reduces opportunities for human growth through exposure to new experiences, produces bare subsistence-level living, and may instigate feelings of self-hatred and disgust (p. 65).

Unfortunately, disabled persons too often have not received the level of job training that enables them to qualify for employment opportunities. This fact is reflected by the following statistics:

1. According to U.S. Census Bureau statistics reported in 1976, 85% of the handicapped population earned less than $7,000 per year, and 52% of this segment of the population earned less than $2,000 per year.
2. Of more than 220 million people in the United States, 30 million are disabled in one way or another, yet only 1.4 million disabled persons are employed.
3. Only 2.1% of the total fiscal year 1978 enrollment in secondary vocational education programs was identified as handicapped.
4. The cost of dependency among unemployed disabled people in this country presently exceeds $114 billion per year, and is increasing yearly.

Forced idleness of disabled persons through unemployment is costly. The cost to taxpayers amounts to billions of dollars annually. Family budgets, too, are often seriously strained. But of much greater concern is the personal degradation that invariably accompanies the waste and confinement of human potential.

Curbing the disproportionate unemployment of handicapped persons represents a challenge that no single agency can accomplish alone. To the contrary, this multi-faceted problem demands genuine cooperation among several agencies.

The number and diversity of agencies, organizations, and institutions involved either directly or peripherally in preparing handicapped persons for employment is surprisingly large. In fact, so many agencies are now trying to outfit the handicapped for employment that job procurement specialists may soon find themselves literally tripping over each other in their efforts to find suitable jobs for the handicapped clients which their respective agencies have trained for employment.

The increase in the number of agencies involved in preparing handicapped persons for employment deserves to be applauded. Nevertheless, this upsurge is not without certain liabilities that need to be addressed at this critical point in time. One of these - the topic of this paper - is the need for increased interagency cooperation among key service providers. This paper is limited in scope to the issue of cooperative linkages between special education, vocational education, vocational rehabilitation, and CETA, with an emphasis on the role of state planning.

Although there are many agencies involved in preparing handicapped persons for employment, there is no over-abundance of resources which have been allocated for training the nation's 30 million handicapped citizens, many of whom desire to be employed. Consequently, it is imperative that all available training resources be coordinated in such a way that a maximum number of handicapped persons receive the highest quality of job training possible.

Although different missions and mandates guide the day-to-day pursuits of special education, vocational education, vocational rehabilitation, and CETA, the four agencies share an important area of overlap in both mission and mandate - assisting handicapped persons to prepare for gainful employment. This four-tiered overlap can constitute a definite asset for handicapped clients, either serendiptitiously or, preferably, as an outcome of resource intensification through interagency planning and cooperation.

Through consistent and conscientious collaboration, these agencies can ensure that handicapped persons have available effective programs at each step in the career preparation continuum: awareness, exploration, decision-making, and preparation. Without collaboration, these same agencies may find themselves spending billions of dollars in public revenues into duplicative, disjointed programs which have relatively few payoffs for handicapped clients - an outcome against which taxpayers as well as the handicapped are sure to revolt.

Although lawmakers have yet to prescribe precise steps to be followed in establishing interagency linkages between special education, vocational education, vocational rehabilitation, and CETA, necessity - that proverbial mother of invention - has sounded a clear clarion call for creative attempts to intensify resources through interagency cooperation. The remainder of this paper will be devoted to background information and practical suggestions for achieving successful and productive interagency linkages between special education, vocational education, vocational rehabilitation, and CETA.

DESCRIPTION OF TARGET AGENCIES

Because of the complex nature of CETA, vocational education, special education, and vocational rehabilitation, a brief description of each agency will be provided.

Special Education

Special education exists to serve children with unique instructional needs. A handicap, however does not always render children eligible for special education. Eligibility for special education is based on the need for specially designed instruction or related services because of unique conditions which adversely affect educational performance. Among the students in need of special education and related services are children who are: hearing impaired, deaf, visually impaired, speech impaired, mentally retarded, learning disabled (specific learning disabled), seriously emotionally disturbed, orthopedically handicapped, and multi-handicapped.

Special education generally includes specially designed instruction which may be provided in a variety of settings: regular classes, resource rooms, special classes, special day schools, residential schools, or institutions. Special education may also consist of a variety of related services, including speech and language pathology, physical and occupational therapy, psychotherapy, adaptive physical education, and special transportation.

Public Law 94-142 (The Education for All Handicapped Children Act of 1975) stipulates that special education is to be provided in a setting which most closely approximates the setting the child would be enrolled in if not handicapped. Furthermore, every child in special education must be served in accordance with a written Individualized Education Program (IEP) which has been developed cooperatively by school administrators, instructional personnel, special educators, and a child's parent(s).

It lies within the scope of special education to offer a variety of career preparation activities for all the children and youth which it serves. The career preparation offered through special education is usually limited to work-study programs, prevocational programs, and programs which focus on preparation for selective employment in sheltered workshops or other non-competitive work settings.

By and large, special education does not get deeply involved in the business of providing hands-on employment training. Rather, it assumes an oversight role by ensuring that handicapped youths have access to vocational education, vocational rehabilitation, CETA, and other employment training resources. Special educators also serve as valuable resource persons to the agencies which provide job training. Because of their advocacy function, special education representatives should be included in cooperative planning efforts on behalf of handicapped persons.

Vocational Education

Vocational education is that part of general education which affords individuals an opportunity to acquire the types of skills which are in demand in business and industry. Vocational education is generally perceived as educational programs which simulate the working environments of agriculture, building trades, health occupations, office occupations, food trades, electronics, and others. Indeed, equipment-filled shop programs account for a substantial part of vocational education. However, there are other key components including: cooperative vocational education (work-study) programs, vocational guidance and counseling programs, and vocational youth organizations.

Vocational education provides hands-on training opportunities for a broad spectrum of students. In some states, practical arts programs at the junior high school level fall under the auspices of vocational education. A wide variety of high school programs are offered, with incentives to include in these programs handicapped and disadvantaged students as well as other students. Post-secondary programs featuring a high degree of technical sophistication (computer technology, hydraulics, food technology) also fall under the rubric of vocational education. Part-time adult education programs in food preparation, auto-mechanics, child care, and other occupational areas are operated within the aegis of vocational education.

Vocational education programs are often designed around a particular set of skills which can render a person employable at a pre-specified level of sophistication. The desired level of occupational sophistication often dictates the length of various training programs as well as their scope. Vocational education is an outcome-conscious organization which for years has used client/student placements in industry as its chief index for measuring program success.

Vocational education, for the most part, is a long-term program. People enter the system unskilled and exit as skilled craft persons, at a minimal entry-level, an apprentice's level, or a more advanced journeyman's level. Unlike CETA and rehabilitation, there are no pressures on vocational education to achieve timely case closures. Vocational education exists so that its constituents can achieve life-long career goals. Skill development within vocational education is approached from a developmental frame of reference rather than a remedial or rehabilitation framework.

Vocational Rehabilitation

Vocational rehabilitation provides a variety of services to handicapped youth and adults. To receive rehabilitation services, a client must be medically certified as having a physical or mental disability which constitutes a barrier to employment.

Each rehabilitation applicant is evaluated to establish the applicant's potential for employment following the provision of rehabilitation services. If determined eligible for rehabilitation, an Individualized Written Rehabilitation Plan (IWRP) is developed by a case counselor. The IWRP specifies the types of services to be provided and the duration of the services. Among the services provided by vocational rehabilitation are the following:

1. Evaluations - medical, psychological, and vocational; to determine employment interests and aptitudes and to establish whether there are medical or psychological barriers to employment that can be corrected.
2. Restorations or prosthetic devices which may be needed before an individual can obtain employment.

3. Training programs of all types: on-the-job training, colleges or university training, apprenticeships, public and private vocational schools.

4. Vocational placement and follow-up at the time a client is determined to be job-ready.

5. Transportation during the training period.

6. Tools, licenses, supplies, and equipment necessary to the useful implementation of the training received.

7. Maintenance payments for living expenses incurred during training.

8. Provision of special modifications in devices which allow the disabled to operate machinery or equipment involved in training or placement.

9. Reader service, interpreter services, or similar help which will allow the disabled person to benefit from training.

Comprehensive Employment and Training Act (CETA)

CETA programs provide special training and employment for people who meet the eligibility criteria of the programs. Each one of the CETA programs has different criteria for determining eligibility. The CETA law was first passed by Congress in 1973 and extended in 1978 for another four years.

CETA is overseen by the U.S. Department of Labor which determined the guidelines that each of the individual program operators is obliged to follow. The actual training or employment programs are administered by local groups called "CETA Prime Sponsors." These groups receive money from the federal program and use it for training and employment programs for the area's residents who need them. Since employment problems differ from one location to another, CETA gives each local authority (prime sponsor) the flexibility to decide what type of programs it needs most.

In general, CETA participants must be economically disadvantaged, unemployed, under-employed, or handicapped. An "economically disadvantaged" person is a member of a family receiving welfare payments or which has a combined income of less than the poverty standard (established by the Office of Management and Budget). An "unemployed individual" has been without a job for a specific period of time and wants to work. An "under-employed" person is working part-time and seeking full-time work. Handicapped individuals need not meet income or unemployment criteria to be CETA eligible, because their handicap, by definition, gives them disadvantaged status.

Prime sponsors must ensure that significant segments of the population are served and that those "most in need" of service are given priority. "Significant segments" identified include:

- Economically disadvantaged
- Veterans
- Youth
- Public Assistance recipients
- Minorities
- Migrants
- Older workers
- Handicapped
- Ex-offenders
- Native Americans
- Educationally disadvantaged
- Persons with limited English

Identification of significant segments is a responsibility of each prime sponsor, not of the federal government. In grant applications, prime sponsors must provide statistics to justify including various segments.

CETA authorizes broad and diverse services to provide whatever an individual may need in order to obtain self-sufficient employment. Local prime sponsors have considerable flexibility in deciding on their particular program mix and how to utilize funds. The following is a list describing various CETA programs which may be offered by prime sponsors.

Classroom Training - is provided in an institutional setting on an individualized or group basis. This training may include specific occupational skills or upgrading skills. Persons in classroom training usually receive a basic training allowance (minimum wage/ hour) while attending class to allow basic income maintenance.

On-The-Job Training (OJT) - takes place in an actual work-site with a public or private employer. OJT is designed to provide specific skills or refine skills in formal settings where trainees are considered employees of the organization. They are given training, receive wages, and other benefits comparable to other employees doing the same kind of work. CETA usually will reimburse an employer for wages during the OJT training period.

Public Service Employment (PSE) - is designed to provide an individual with a consistent work history in a particular occupation, and to provide job training. After the public service period, participants are assisted in a transition to unsubsidized employment. These PSE jobs are located in public and private non-profit organizations where CETA reimburses wages. PSE participants receive the same wage scales and benefits as others in the organization do.

Work Experience - provides short-term work assignments in order to introduce participants to actual job environments and to develop work histories. Participants receive at least minimum wage for their work.

Other Manpower and Supportive Services - manpower services may include, but are not limited to:

- Outreach to locate "significant segments" and "most in need."

- Intake - the determination and verification of eligibility for CETA.
- Assessment - to determine what services are needed to develop an individual Employability Development Plan (EDP).
- Counseling in labor market conditions, vocational choice, career guidance, and on-the-job counseling.
- Job development with an emphasis on individual job search and group job solicitation.

Supportive services, handled on an individual basis, may include:

- Transportaton or transportation allowances.
- Health care and medical services.
- Care for dependents.
- Residential support.
- Family planning and counseling.
- Legal services.

For a more complete description of titles which govern the operation of the various CETA programs, see appendix A.

THEORY INTO PRACTICE

From the previous descriptions of special education, vocational education, vocational rehabilitation, and CETA, one can readily see the complexities that will face the agency representatives who wish to enter into a meaningful cooperative alliance. However, the task is not formidable if approached through a process practiced by virtually all disciplines involved in employment preparation - task analysis.

Each agency employs staff with the necessary knowledge and experience to identify and task analyze those agency components (activities) which may benefit from cooperation or coordination with representatives of other agencies. These linkage points need to be identified by both top level administrators and direct service providers. Perhaps the most beneficial cooperative undertakings will be carried out by agency specialists whose areas of responsibility fall within a very restrictive field. These program specialists may be in the best position of initially identifying linkage points.

For example, client assessment is an area which often is benefited by interagency cooperative endeavors. Such activities may include sharing client information (if permission is given to do so), exchanging information about assessment procedures, or perhaps sharing assessment facilities. Agency administrators may not have the backgrounds enabling them to specify how or whether cooperation should take place with respect to assessment activities. Thus, assessment experts from the various agencies should have the opportunity to get together to identify what types of linkages relative to assessment could be of benefit to the agencies and their respective clients. In attempting to identify the points, issues, and circumstances where interagency cooperation may be beneficial, it is suggested that self-studies be undertaken by representatives of field staff as well as agency administrators. Once linkage points have been identified, agency administrators or their designatees can consider potential policy and service delivery changes needed to ensure cooperation.

After various linkage points have been identified, it should be determined whether these points call for two-party or multiple-party agreements. On some points, for example, vocational education may find it necessary or advantageous to cooperate with vocational rehabilitation but not with CETA or special education. This is not a suggestion for developing a series of disjointed mini-agreements. There can be broad cooperative statements which are applicable to a number of agencies. At the same time, there can be subcomponents which stipulate concrete linkages between subsets of agencies.

Agency Advisory Councils

A number of states have created state employment and training councils. These councils are usually made up of representatives from CETA, education, rehabilitation, employment security, business and industry, and others. A council of this nature provides an excellent forum for endorsing the notion of interagency cooperation. However, direct service personnel also need to be provided with opportunities to identify areas worthy of potential cooperative endeavors.

Vocational education, special education, and CETA each make use of advisory councils for the purpose of soliciting input from consumers, service providers, and other interested parties. Within the three agencies, there are local councils as well as state level councils. Vocational rehabilitation agencies typically make less use of advisory groups, and in many states there are no provisions for vocational rehabilitation advisory boards. CETA prime sponsors may be advised by a variety of councils, including a private industry council, youth council, planning council, and a general purpose council.

Advisory groups represent useful vehicles for establishing one level of interagency linkages. Advisory councils have the advantage of giving all members of the council genuine status within the host agency, including the right to vote on council recommendations. Such groups have the added benefit of meeting regularly--something that informal interagency groups may find difficult to accomplish.

Councils provide meaningful forum for discussing problem areas, long-term goals, collaborative projects, training needs, evaluation designs, funding sources, personnel needs, and numerous other matters that impact mutually on agencies which have overlapping missions. However, there are definite drawbacks and limitations to the level of cooperation which can be achieved through advisory councils. The leaders within an agency may only serve as ex-officio members of their respective advisory groups. Thus, these leaders who must implement linkage activities may have limited input at the council level. Moreover, concerns raised in a particular council may be biased in favor of that agency's orientation, philosophies, and current mode of service delivery. In spite of their drawbacks, advisory councils deserve to be considered as one avenue for establishing ongoing linkages.

State Plans

Virtually every agency which receives federal funds is required to develop a state plan which describes the activities and projects to be carried out with the federal funds. State plans are developed annually or at other specified intervals.

State plans represent another worthwhile opportunity to create linkages. There are some educational benefits to be derived from having the representatives of one agency review the plan of another agency. However, if substantial benefits are to be derived through state plan input, agency leaders must meet early in the period in which a plan is being formulated. If there are discretionary funds which can be earmarked for interagency activities, the decision to allocate them for a particular activity must be made early in the planning process. In fact, such decisions may have to be made a year or more prior to the time a plan is drafted.

State plans typically must go through a public hearing process as well as an internal A-95 review by state agencies. Both procedures provide the opportunity for interagency reviews; but, in reality, neither provides the opportunity for genuine interagency planning. That must occur before the plan is written.

Cooperative Agreement Documents

A cooperative written agreement is a formal policy statement which stipulates the terms and conditions under which two or more agencies will cooperate. A publication prepared by the Office of Manpower within the former Department of Health, Education and Welfare, Education and CETA: A Coordination Guide for Adult Education and Vocational Administrators (1976) lists nine considerations which should be addressed in a written agreement:

1. Precisely what is to be accomplished between the two parties (purpose, reason for coordinating).
2. The situations in which the agreement will apply.
3. A summary of the agency activities that are affected by coordination and the way in which these activities will be expected to serve the coordination project.
4. Who, in each organization, is responsible for the specific activities listed.
5. What will constitute service standards, response time, and others.
6. Administrative procedures (reporting procedures, supervision, and others).
7. How and how often service standards will be reviewed.
8. Modification procedures.
9. Financial arrangements.

For a more extensive checklist of considerations that should go into the preparation of a cooperative agreement, refer to Appendix A. This checklist was extracted from a resource manual developed by the Wisconsin Vocational Studies Center, University of Wisconsin-Madison under the leadership of Dr. Lloyd Tindall. Tindall is directing a national project on models for linking Vocational Education with agencies which serve the handicapped. The project was initiated in 1979 and will continue through 1981.

Barriers to Interagency Cooperation

State agency administrators often have all they can do to look after their own programs. Thus, before many administrators will enter into a cooperative endeavor, there has to exist a strong likelihood that the cooperative initiative will result in substantial payoffs to clients. Cooperative agreements have been written for decades but often to no avail. Hence, experienced administrators may have too great a history of unproductive cooperative experiences to respond enthusiastically to the current federal initiative to encourage interagency cooperation.

There are some fundamental philosophical issues that may impale the move to cooperate. CETA prime sponsors, like the clients whom they serve, often view the education community as being stale and disinterested. Educators, on the other hand, often view CETA as squanderers of huge sums of money on programs which lack quality and produce only a band-aid approach to complex problems. Attitudes of competition and distrust are particularly evident between vocational education and CETA. Tindall (1979) has conceptualized a list of barriers and a list of incentives for cooperation (See Figure 1).

This brief discussion on barriers is not strictly academic. While the listing of potential barriers to successful linkages is not recommended as the way to launch a cooperative effort, it is an exercise which should be done at least by the state leaders who support the concept of interagency cooperation. Barriers are real; therefore, contingencies must be identified for dealing with them.

Some barrier-removing strategies have been listed in the Office of Manpower publication: Education and CETA, a Coordination Guide for Adult Education and Vocational Administrators (1976). These include the following:

1. Expect problems and budget enough time (both calendar time and person-hours) to deal with them. Even the most thorough planning cannot account for all contingencies.
2. When lack of progress in any one specific area threatens the undertaking, review the original agreement on benefits, particularly those accruing to clients, and the agreement to date, emphasizing where the ability to resolve issues has already been demonstrated.
3. Keep in mind that individuals in both organizations have the same kinds of concerns (political, personalities, regulations) with internal issues.
4. If unable to resolve an issue that is critical to the success of coordination, do not move ahead until it is resolved (above). There is almost never a reason to expect that resolution will become easier in the future.
5. Do not let individuals involved in implementing a coordination strategy get so involved in the process of accomplishing it that they forget why they wanted it in the first place.
6. Plan the work with a view toward conflicting or competing time requirements. If, for instance, the major activity in preparing for coordination must occur simultaneously with final preparation of the yearly program plan or an agency reorganization, chances are coordination will come in second -- and last.
7. Once it has been decided that coordination will in fact take place, internal staff of both programs should be thoroughly oriented on what this means for them and what will be expected of them. If staff is involved at the proper time, they are likely to have more of an interest in and commitment to the success of the effort.

FIGURE 1

Factors Affecting Cooperation

Source: Research Utilization Laboratory,
Chicago Jewish Vocational Service, 1977.

BARRIERS TO COOPERATION

Fears

- Of being absorbed into or controlled by another agency or the government.
- That failures or inadequacies will be discovered and exposed.
- That funding sources will disapprove and cut off funds.
- That exchanging resources will mean losing them, or at least getting less than you give.
- Of innovation as such.
- Of change.

Lack of Communication

- Lack of information about the functions and resources of other agencies.
- Not knowing which agencies exist in the first place.
- Such specialized activities that other needs or options are not perceived.
- Energy, drained by dealing with a large, complex bureaucracy.
- Overworked staff does not plan or see possibilities.

Environmental Factors

- No funds for new ventures and other resources available for exchange.
- Feuds between agencies because of personalities, or professional traditions and prejudices.
- Competition for clients and other resources.

INCENTIVES TO COOPERATION

Outside Pressures

- Change in a major funding source's priorities.
- Scarcity of resources crucial to service delivery.
- General reduction of funding levels, necessitating more efficient operation.
- Demand for new services or improvements in old ones.
- An emergency, such as a flood or earthquake.
- A gap in existing services.

Prevailing Atmosphere

- General interest in innovation.
- A history of cooperation among agencies.
- A mutual desire to decrease overlap in services and/or make maximum use of resources.
- General compatability of objectives.

Self-Interest

- Status gained from cooperating with a more prestigious agency.
- Gain of tangible benefits.
- Surplus resources that can be traded/
- Increased exposure and recognition through increased services.

CONCLUSION

Several agencies have overlapping missions with respect to preparing handicapped persons for employment. To avoid duplicative programming and to achieve intensification of resources, agencies can enter into cooperative agreements with the aim of increasing their individual and collective efficiency. This paper reviewed some of the barriers to formulating successful interagency linkages and the steps that can be taken to reduce the risks of entering into non-productive cooperative agreements. A checklist was given of the considerations to be made during the formative stages of establishing interagency linkages. The role of advisory councils and state plans in formulating linkages was discussed as was the need for written agreements of cooperation. Some specific suggestions were made as to how vocational education, special education, vocational rehabilitation, and CETA can cooperate on behalf of handicapped clients.

There have been previous federal initiatives to encourage interagency cooperation, but the outcomes often were not substantial enough to encourage federal agencies to issue mandates to cooperate. However, the incentives are potentially greater today than in the past. There are more handicapped persons and other special needs groups which are aggressively seeking employment and are insisting that government agencies provide employment training.

There is a growing awareness that the resources for providing human services are finite and therefore must be utilized with maximum efficiency. There are more agencies and institutions which are providing services on a multidisciplinary team basis. These trends and conditions substantiate the reasonableness of another national initiative toward establishing interagency linkages.

APPENDIX A

CETA Titles

To understand CETA's complex nature even in a cursory manner, it is necessary to have an awareness of the predominant titles which prescribe the types of programs and services which CETA contractors may operate or which CETA prime sponsors must carry out.

Title I - Administrative Provisions:

1. Establishes an Office of Management Assistance to provide prime sponsors with management and technical services to improve administration.
2. Limits client participation to 2½ years total in any 5 year period.
3. Public service wages may not exceed $10,000 per year and average wages in each prime sponsor area may not exceed $7,200.

Title II - CETA Services (Training, education, retraining, work experience, and other Services):

1. Participants must be economically disadvantaged and either unemployed, under-employed or in-school.
2. Public Service Employment (PSE) participants must be disadvantaged and unemployed 15 or more weeks.
3. PSE jobs must be entry-level and provide clients with employment training and supportive services.

This part of Title II, Public Service Employment was eliminated in 1981.

Title III - Special Federal Responsibilities:

1. Title III provides for special programs for persons with unique disadvantages in the labor market such as Native Americans, migrant and seasonal farm workers, handicapped persons, women, displaced homemakers, and other groups.

2. Although Title III stipulates that handicapped persons are to be treated as a special responsibility, it mandates no specific programs for coordination between CETA Prime Sponsors and Vocational Rehabilitation agencies or other agencies serving the handicapped. Reviews of Prime Sponsor activities show that the handicapped are served if they are referred for CETA services. However, Prime Sponsors in many catchment areas are serving proportionately few handicapped persons because of the following reasons:

   a. Rehabilitation agencies or institutions are either not knowledgeable about specific CETA services or are not using them.

   b. Insufficient outreach is done by CETA Prime Sponsors to encourage participation by the handicapped.

   c. Few Prime Sponsors have gathered the demographic information which tells them the percentage of handicapped persons within their catchment area who need employment training.

   d. Many rehabilitation counselors, and handicapped persons themselves, are reluctant to refer clients to CETA for job assistance because of a reputation some CETA placement specialists have for giving lowest priority to clients who are the most hard-to-place. This occurs most frequently when the placement or OJT training services are subcontracted out and the contractor is obligated to place people as quickly as possible.

   e. The availability of limited job slots may encourage the "creaming" of clients in which case handicapped persons will invariably end up near the bottom. Also, at present, insufficient training has often been given to CETA staff to help them understand such target groups as the handicapped.

Title IV - Youth Programs:

This title provides a broad range of coordinated employment and training programs for eligible youth. There are three parts and several subparts to this title: Part A -- Youth Employment Demonstration Programs; Part B -- Job Corps; and Part C -- Summer Youth Programs. Sixteen categories of service may be funded under this title, including: outreach, assessment orientation, counseling, literacy training, attainment of equivalency certificates, job-sampling, on-the-job training, job restructuring, and placement assistance.

Title V - National Commission for Employment Policy:

Title V establishes a national advisory commission for CETA. The commission is given the responsibility for identifying national employment training needs and for evaluating the impact of CETA on meeting these needs. The title also directs the commission to assess the extent to which CETA, vocational education, vocational rehabilitation, and other programs represent a consistent, integrated, and coordinated approach to the nation's employment training needs.

Title VI - Countercyclical Public Service Employment Program (not currently funded):

Title VI provided for temporary public service job opportunities during periods of high unemployment or recession.

- Participants must be unemployed at least 10 of the last 12 weeks or be on welfare.
- All jobs must be entry-level and provide training.
- 2 percent of the funds must be reserved for Native Americans and the remainder can be used at the Secretary's discretion.
- Title VI includes enough funds to support jobs for the 25 percent of the unemployed over a 7 percent national unemployment rate.

Title VII - Private Sector Opportunities for the Economically Disadvantaged:

This title authorizes a program to increase involvement of the business community in CETA employment and training activities and to increase the number of private sector jobs for the disadvantaged. It is authorized through 1981. The main focus is upon the employment of economically disadvantaged, but no special efforts are mandated to assist the handicapped.

Title VIII - Young Adult Conservation Corps (has been eliminated):

This title provided employment and experience in various occupational skills to out-of-school youth from all social and economic backgrounds.

- This Title provides work on conservation and other public works projects.
- Participants may be hired for a maximum of 12 months.
- It is authorized through 1982 and operated under agreement by the Departments of Labor, Agriculture, and Interior.

APPENDIX B

Checklist

_____1. Appoint a representative from each agency to become responsible for organizing an interagency team.

_____2. Seek representation from various levels of programming from the participating agencies.

_____3. Seek membership from advisory committees, liaison groups, and advocacy organizations.

_____4. Establish a calendar and determine dates for interagency team meetings.

_____5. Develop the basic assumptions upon which the need for interagency cooperation is based.

_____6. Develop a common set of definitions agreed to and used by all agencies.

_____7. Review existing cooperative service agreements, their implementation and effectiveness.

_____8. Collect all relevant information (legislation, regulations, guidelines, policies, and directives, etc.) pertaining to occupational preparation, especially as it relates to the handicapped.

_____9. Categorize data according to a service delivery process which identifies the following:

- Mandated services
- Permissive services
- Duplication of services
- Gaps in service delivery

_____10. Identify specific problem areas not addressed in federal and state legislation, regulations, and policies which may impede cooperative service delivery.

_____11. Establish eligibility criteria by setting minimum instructional components and entry-level requirements.

_____12. Formulate interagency goals and establish timelines for the development, implementation, and evaluation of the interagency cooperative service agreement.

_____13. Prepare the criteria and the process by which interagency collaboration will be implemented and evaluated.

_____14. Establish funding procedures to facilitate joint program development and implementation.

_____15. Present goals, timelines, and evaluation process to participating agencies and cooperating groups for approval and acceptance.

_____16. Assign appropriate individuals to write the first draft of a written agreement.

_____17. Review first draft and agree on revisions.

_____18. Prepare final draft and make necessary revisions suggested by agencies.

_____19. Secure any administrators' signatures.

_____20. Establish communication linkages and information dissemination procedures.

_____21. Establish inter/intraagency personnel department.

_____22. Assign an interagency team (state and local representation) to design evaluation procedures and timelines.

_____23. Establish monitoring procedures and guidelines to assist in the evaluation of interagency collaboration. A process for gathering and reporting data has to be jointly developed to ensure that "monitor data" is shared and becomes part of the total evaluation. Types of data which monitoring should provide include:

a. appropriateness of service

b. IEP/IWRP reviews

c. gaps and overlaps in service delivery

d. client/trainer input

e. complaints

f. problem/resolution

_____24. Establish a schedule for periodic reviews, (i.e., 3 or 6 months) of the agreement and its effectiveness in the joint delivery of services to handicapped individuals. At such meetings, a review and analysis of "monitor data" can provide the basis for determining the degree of success in maximizing occupational opportunities for handicapped individuals.

_____25. Establish process for gathering and reporting data from the periodic reviews. The following components could be incorporated:

a. Intra/interagency summary of activities pertaining to interagency collaboration.

b. A summary of major findings from monitoring process and from the periodic reviews.

c. Recommendations to be considered in the renegotiation of new agreements. The final report should be shared with all participating agencies, advocacy/advisory groups, and other governmental and policy making bodies which have influence over educational and training programming.

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Funding CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages

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To make possible the leap from the rhetoric of linkage to actual coordination of services, education and employment and training advisors, planners, and service deliverers need to understand the intricacies of each others' funding policies and procedures. If planning services for one pool of federal dollars is difficult, the task of coordinated planning among different delivery systems, with different funding allocations and administrative criteria requires a great effort by several actors. Indeed, many states already have opted not to accept some targeted categories of federal education dollars because of the perception that the effort required for planning and reporting is not balanced by the available funding levels. The stipulations attached to special education, vocational education, rehabilitation, and CETA confound rational coordination of services. Eligibility and administrative mandates which regulate funding policies frequently inhibit linkage efforts. The important question is whether those responsible for planning and delivering human service programs can be enticed to make the even greater effort needed to coordinate and plan with others. For example, CETA funds have changed over the course of each year, and also come late because of the federal appropriations process.

There is nothing in the laws which authorize federal expenditures for vocational education, special education, vocational rehabilitation, and employment and training that prevents joint programming. In fact, cooperative delivery of services is actually encouraged and articulated in the federal regulations which govern the various laws. The regulations for the Education for All Handicapped Children Act of 1975 allow for the provision of vocational education, and employ the same definition of vocational education delineated in the Vocational Education Act. The Vocational Education Act regulations define handicapped in the same way as the special education law. These regulations also encourage state level coordination of vocational education and manpower training, require vocational education councils to review the activities of state level employment and training councils, and mandate establishment of an occupational information system to meet the common needs of vocational educators and CETA prime sponsors.

LINKAGE INITIATIVES

In an effort to avoid duplication of effort, CETA prime sponsors who are the local recipients of CETA funds, are required to coordinate services through linkage agreements, especially with schools and any other appropriate service providers. Six percent of CETA adult training allocations are set-aside for supplemental vocational programs. The CETA youth program requirements for programmatic linkages are even more important mandates for collaboration and have implications for joint programming and funding under other federal statutes.

The Youth Employment and Demonstration Project Act of 1977 (YEDPA), amended as Title IV of CETA in 1978, represents a landmark attempt to combine education with CETA youth programs by earmarking funds for collaborative agreements between CETA prime sponsors and the schools. The largest local program authorized by YEDPA is the Youth Employment and Training Program (YETP). Prime sponsors are required to direct a minimum of 22 percent of those YETP funds, distributed nationally by formula, to joint programming with local education agencies. In some cases, this percentage has been far greater in practice, occasionally reaching 100 percent. All prime sponsors are further encouraged to arrange with the schools, for academic credit for work experience. YEDPA was thus intended as a tool for encouraging institutional cooperation and collaboration with dollars as the primary incentive.

The impacts of the so-called "22 percent YETP set-aside" as a financial incentive mechanism to promote coordination are uneven. Because local discretion is allowed, some CETA prime sponsors simply turn the funds over to local education agencies for programming purposes. Without the active involvement of prime sponsors these local agreements frequently lack substance. Others have used the funds to creatively and cooperatively design and implement programs and services to reach those believed most in need by emphasizing the best features of each agency in a comprehensive service framework.

Washington has actively pursued linkage activities to offset the mixed local response by providing guidance. The Departments of Education and Labor have pooled their Secretarys' discretionary funds to support incentive grants to demonstration projects which aspire to improve linkages and service coordination. This coordination of money to fund singular efforts has produced many models worthy of replication. Notable among these are the CETA and Vocational Education Incentive Programs which supported several linkage models. The Exemplary In-School Demonstration Project was funded predominantly by the Department of Labor. It actually represented 85 discrete projects set up through an intermediary non-profit corporation called Youthwork, Incorporated. Though the Youthwork projects include very little interagency dollars from the federal government, they have focused heavily on coordinating employment and training with education. The projects were further targeted to particular purposes, among them career information, counseling and guidance, academic credit for work experience, and projects focusing on service to handicapped and high risk youth.

YEDPA discretionary funds have supported literally hundreds of projects. Similar to the linkage emphasis at the local level through the 22 percent YETP set-aside, nationally funded discretionary projects sought, among other things, to consciously identify successful school/CETA working arrangements. Establishment of these arrangements between the two institutions is necessary before any discussions about linking CETA services with specific programs within education makes sense.

IMPEDIMENTS TO DEVELOPING LINKAGES

If coordination is not only desirable but also legally and/or administratively highlighted, why then do poorly coordinated and duplicative services persist? After years of attempts at linking services the answers are well documented. The same regulations which encourage linking also confound the linking process. But the awkward regulations are only an overlay to more substantive barriers inhibiting coordination including: historical distrust, differences in standards and objectives, "turf" issues, and difficulties coordinating the CETA program year with the schools' academic and fiscal years. Some local education agencies, for example, complete planning in early spring, just as the CETA planning year begins. Further, local education agencies have little accountability to the Department of Education because of the traditionally sovereign roles of state and local government in public education. Public schools also have no accountability to the Department of Labor. In short, local education agencies cannot, nor should they, be coerced into cooperating with employment and training. Persuasion is more appropriate, but it is also a less direct approach to accessing education agencies and is a tremendously indirect approach to coordination with vocational and special education.

Coleman and Wurzburg (1979) reported on the discrepancies between what local employment and training and education planners hoped to accomplish and what they actually accomplished through joint programs. Their study of CETA prime sponsors revealed that the mandates for collaboration have produced few results because of the lack of mechanisms to facilitate the process of coordination or of sufficient incentives to overcome the obstacles to cooperation. Financial incentives alone are not enough to foster service linkages. The factors inhibiting linkage are rooted in the administrative and substantive differences between the employment and training and education institutions.

CETA funds, similar to federal vocational and special education funds, are allocated annually by formula. However, the formula criteria differ substantially. In addition, neither the planning processes nor the flow of funds under the different authorities coincide. The regulations governing the administration of various funds also call for different reporting systems and sometimes varying definitions of populations and services.

The monitors of vocational education, special education, and CETA at the state level are the councils and boards established and funded by law. For the most part, these groups operate quite independently of one another and react to local linkage plans rather than take a proactive stance to merge the different institutions and programs. A number of factors beyond institutional inertia contribute to the lack of active support from the top for joint programming between local education agencies and CETA prime sponsors.

The political volatility of CETA also makes CETA prime sponsors unreliable partners in coordination. Funding for CETA fluctuates more than funding for special or vocational education, leaving linkage partners with insecurities about service continuation in successive years or even within a given year. Fluctuations are inevitable because local CETA prime sponsors depend on the federal government for all of their employment and training money. Educators get approximately $7 of every $8 from non-federal sources. A 25 percent reduction of CETA funds has a more drastic implication for maintenance of service levels than would a comparable cut in federal funds for vocational and special education which reduces only the federal portion of funds dominated by state and local shares.

A second reason for the greater volatility of CETA funding levels is that the formula used to allocate CETA funds is more sensitive to changeable economic conditions than are the formulae used for allocation of federal vocational education and special education dollars. The CETA formula is keyed to local unemployment rates and the size of the unemployed pool, while the categorical education funds formulae are keyed to the more constant universe of need and national per pupil expenditures averages.

The total dependence of CETA prime sponsors on federal dollars also means prime sponsors must react more to political concerns from the federal government. For example, a few years ago, CETA prime sponsors responded to Washington's call for a massive build up of CETA subsidized jobs with a concommitant deemphasis on other programs. In the following years an increasing emphasis on youth programs culminated in a legislative proposal in 1980 for adding $2 billion dollars to youth initiatives linking school and work. Then after local planners began making arrangements for massive infusion of new resources and despite bipartisan support in the Congress for the measure, the administration witndrew funding and cut funding in existing programs. With prime sponsors struggling through externally imposed shifts in programmatic emphasis and dollars, and schools grappling internally with burdensome planning and reporting requirements, it is not surprising that the two sides have little opportunity to sit down and discuss the fine points of comprehensive delivery of services in areas of mutual interest.

Finally, recent federal budget cuts and the policies behind those cuts are placing CETA and the diverse education constituencies in competition wth one another for limited funds. For example, Congressional lobbying restored some funds cut from vocational education by making additional cuts to CETA. However, the administration proposals still fall $2 billion short of meeting current services requirements for education including vocational education. This competition forces an adversary relationship among parties which should be on the same side and may significantly damage the fragile linkages built over the last few years. With this scenario on the horizon one is reminded of the words of former Senator Jacob Javits four years ago:

> "In the absence of ... linkages, in-school youth may continue to be served by two separate and competing delivery systems which bifurcate their labor market experience at a critical state of their transition between school and work."[3]

Perhaps policy makers need to be reminded that the two delivery systems have a common mission: to prepare youth for adulthood. Recent funding policies serve to drive the youth-serving institutions further apart resulting in waste and inefficiency.

In summary, the impediments to effective linkages are many. They include: historical distrust and "turf" issues; incompatible funding cycles, planning requirements, definitions, and allocation formulae; sanctions against coordination of funds necessitating separate reporting burdens; the instability of CETA funds; shifting programmatic emphases resulting from political maneuvering; lack of linkage enforcement and accountability structures; duplicative and uncoordinated state level boards and councils; and competition for diminishing federal resources. These impediments and issues need to be dealt with before linkages can be made among CETA, vocational education, special education, and vocational rehabilitation.

IS LINKING WORTHWHILE?

With the institutional disincentives for linkages having the edge over incentives, why should CETA, vocational education, special education, and vocational rehabilitation trouble themselves wth the administrative headaches of coordinating services? The answer finds itself in reversal of the question. That is, why should those in need of comprehensive services be penalized because of the administrative encumbrances which accompany coordination? People are served best when the focus is on client groups and their needs rather than on the institutions providing certain services.

Programs authorized by the federal laws cannot do everything mandated in the laws by themselves. In general, CETA cannot provide training as well as vocational education. However, the economically disadvantaged and school dropouts lack adequate access to vocational education. CETA cannot provide the same quality of training service to handicapped individuals that vocational rehabilitation agencies can nor can it compete with special education in delivering basic education skills to those individuals. In addition, work experience provided by vocational education frequently duplicates that offered by CETA. Special education law is overly ambitious, necessitating coordination with a multitude of social service agencies to ensure the comprehensive delivery of services.

Linkages make dollar sense. In times of limited resources and the likelihood of reduced service levels, the linkage route offers a way for each institution to concentrate upon what it does best, while permitting clients to still benefit from a menu of comprehensive services. However, this cannot happen until CETA and education programs recognize that they are locked in self-defeating competitions among themselves.

Those who claim that the current trend toward linkages is one more passing fad argue quite persuasively that the risk of delay in getting services off the ground and the likelihood that something will go wrong multiplies as the number of linkages increases. Their rationale is that the more pieces there are in the delivery network, the greater is the chance that the whole linked system will be upset if one piece breaks down. However, a linkage study (Dunn & Taggart, 1980) of 39 YEDPA-funded school-to-work transition demonstration projects did not support that argument. Highly linked projects did experience a slower start-up phase than did the less linked projects. But once started the highly linked programs achieved greater fiscal economies, were less likely to undergo modification, and were able to increase enrollment more quickly than the projects with limited linkages.

WHAT ARE THE COMMONALITIES?

An important commonality among programs for employment and training, general education, vocational education, special education, and vocational rehabilitaton is their emphasis on serving those who are economically disenfranchised and who are not part of mainstream America. These include the handicapped, economically and educationally disadvantaged, and high risk youth (offenders, truants, dropouts, drug abusers, teenage parents, the limited English-proficient, and those outside of the predominant Anglo culture). Many of the services authorized under vocational rehabilitation, vocational education, special education, and employment and training agencies are similar and unnecessarily duplicative if not coordinated. The potential for developing a comprehensive approach to service provision revolves around a focus on the common groups now served by each delivery mechanism and the pooled resources which support services from which those groups can benefit.

ARE BLOCK GRANTS THE ANSWER?

The missions of vocational education, special education, vocational rehabilitation, and CETA are very compatible. The accompanying administrative requirements imposed by the different funding mechanisms are not. Why not advocate consolidation of these funds in a single block grant? The current administration proposes consolidation of funds of over 100 federal programs into six block grants to the states. As with the arguments in favor of internal CETA consolidation, the notion of block granting carries some tempting promises. Underneath these promises lurks a fundamental problem. The enterprise of targeting federal dollars to categorical programs which have been developed because not all states were adequately addressing the needs and rights of those now served by the targeted programs. In the absence of federal leverage, is there any reason to believe that things will not return to where they were in the precategorical program days? Moreover, there is nothing in the current block grant proposals to suggest that block grants will adequately deal with the problem of non-coordination of services. Current block grant proposals

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lack any attempts to distinguish rationally among those services and responsibilities that are appropriately federal, those that are appropriately state, and those that are appropriately local. Instead, block grant proposals appear to be nothing more than poorly contrived pretexts for achieving another goal of reduced federal spending for social programs.

WHAT NEEDS TO BE DONE?

Policy recommendations can aim at many levels. There are policy approaches which accept the status quo, for the most part, and emphasize simple improvements in what is already in place. Conversely, there are policy approaches which transcend what already exists and look with vision to more rational mechanisms. The manpower, rehabilitation, and education communities can be content with incremental change or they can become visionaries willing to move systems forward. The following recommendations are designed to assist policy makers in developing effective CETA/ vocational education, special education, and vocational rehabilitilitaion linkages.

At the national level, the Departments of Labor and Education should develop a coordinated set of regulations around areas of commonality among vocational and special education, vocational rehabilitation, and CETA. These regulations would acknowledge compatible missions, and minimize differences in plan submission deadlines and reporting requirements. Reporting should be coordinated and centralized with local retrieval of data.

A stable system of incentive bonus grants funded jointly with the Secretarys' discretionary funds from Labor and Education should be established. The bonus grants should focus on and promote national categorical priorities, such as comprehensive delivery of services to the handicapped and the gifted.

The maintenance of separate single-purpose advisory panels, councils, and boards at the state level should be discouraged in favor of multipurpose state councils which would have the function of coordinating services, fostering cooperation, and maximizing use of the various categorical federal funds. These councils should represent consumer groups, business, and unions in addition to the current representation which is spread out over separate advisory units. State councils should establish and provide assistance to local councils.

The Congress should consider multi-year funding of programs to introduce stability into the systems and, therefore, into the lives of service recipients. The formula for determining local allocations should be stabilized by using factors that reflect long-term client needs rather than short-term labor market conditions. Reporting requirements and planning should reflect this multi-year funding by reducing the frequency of lengthy annual plans and supporting documentation. Annual reports, similar to those prepared by private industry could supplant annual comprehensive plans and would serve as the basis for modifying the multi-year plan as appropriate.

Funding of various employment, training, and education programs for the services authorized by companion laws and regulations will come from the public general revenue. It is suggested here that serious consideration be directed to alternative funding approaches. One proposal to consider assumes a measure of responsibility on the part of business and industry for all employment and training activities. This proposal argues that employers are the major beneficiaries of an employable, skilled, and educated labor supply. Corporations never question their responsibility to make capital investments in equipment to maintain a competitive edge in a free market. However, very few private employers accept the responsibility for investing in human resource development. Instead, individuals and the government subsidize human resource development for private industry. One way to distribute costs more equitably is to finance a portion of job-specific training with an employer tax similar to the unemployment insurance tax (Taggart, 1981). Additional funding alternatives need to be developed and examined closely to adequately serve both the individual and society.

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Individualized Planning and Programming

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Individualized planning is regarded as making both the system and the individual client more accountable. Advocates of individualized program planning see it as a way to reform unresponsive delivery systems by forcing agencies to identify and deal with the needs of individual clients. Opponents of individualized planning or at least of requiring individualized educational or employability development plans (IEPs/EDPs) for all "special needs" or "at-risk" populations, argue that such procedures are too expensive and that individualized planning is little more than a paper exercise.

Evidence to date would suggest that the truth lies somewhere in-between and that individualized planning in and of itself is insufficient to achieve successful participation or the desired goal of meeting individual needs. Rather, it is the delivery systems and methods of instruction that must be changed to affect greater system responsiveness to student or participant needs. Requirements for individualized planning may, however, be a useful wedge to drive both the educational and employment and training systems to make necessary adaptations and changes in the way services are delivered.

The concept of individualized planning is not new. Medical and social service programs have used diagnostic and case management approaches for years. However, these techniques are now being applied to all handicapped children in educational programs, as well as to a variety of other populations having multiple problems and needs within employment and training programs.

The focus of this paper is on the experience of implementing individualized planning requirements within education and employment and training programs. Since the primary objectives of these plans are education and training related, individual needs are defined as those necessary to enable the individual to access, participate in, and successfully complete needed educational and employment and training services. Further, a distinction is being made here between the individualized planning process itself and individualized service delivery and individualized instruction which are often included under the banner of individualized planning. These concepts are defined as follows:

- Individualized Planning is the process by which occupational or educational objectives are specified and service strategies developed based on an assessment of each individual's strengths and weaknesses relative to basic educational and employment related competencies. The assessment process relates these competencies to service needs and available services, and measures or evaluates each individual's progress toward achieving specified outcome objectives on a periodic basis during the course of the program.

- Individualized Service Delivery involves the planning and implementation of the service strategy that has been structured to accommodate individual circumstances. Such individualization assumes both the availability of transportation, health, child care, and other services to meet each student's or participant's needs and the program interface and institutional flexibility needed to make the prescribed services accessible. Terms such as comprehensive service delivery system, integration of service, long range developmental service strategies, and continuum of service are used to speak of desired adaptability of service delivery systems to change and become more responsive to individual needs.

- Individualized Instruction refers to competency-based, instructional programs which are self-paced, allowing students to enter and leave according to their own abilities and needs. Such instructional programs may be modular, classroom-based, experiential or computer-assisted and may cover educational, occupational, and behavioral areas.

LEGISLATIVE MANDATES AND PROGRAM REQUIREMENTS

Legislative requirements for individualized planning can be found in numerous currently existing laws. Although different populations are the intended beneficiaries of service, they are all "at-risk" of failure in one way or another and therefore in need of a range of specially designed instructional, support, and related services which usually cannot be provided by one individual or one agency. Specifically:

The Eduation for all Handicapped Children Act of 1975 (P.L. 94-142) requires the development and implementation of Individualized Education Programs (IEP) for all handicapped students as the central mechanism in providing a "free and appropriate public education." If vocational education funds are used to serve handicapped students, the vocational program must be also planned and coordinated as a part of the student's IEP. Sometimes this plan is referred to as an Individualized Vocational Education Plan IVEP. IEP's must include:

- An assessment of the student's present levels of educational performance with both short-term and annual learning objectives to be achieved as a result of the individualized program,
- A process and criteria for evaluating achievement of instructional objectives, and
- A description of the services to be provided including anticipated timetables for beginning and completion of services.

Some educators have added an Implementation/Instructional Plan (IIP) to the EDP so that teaching strategies can be specified.

The Rehabilitation Act of 1973 (P.L. 93-112) requires that an Individualized Written Rehabilitation Plan (IWRP) be initiated and periodically updated for each eligible individual and those being provided services under an extended evaluation to determine their rehabilitation potential. The IWRP which places primary emphasis on the determination and achievement of a vocational goal must be developed jointly by vocational rehabilitation staff; the handicapped individual; and when appropriate his or her parent, guardian, or other representative. This agency is then responsible for providing services as specified in the plan. Among other things the IWRP must include:

- Long-range and intermediate rehabilitation objectives established for the individual,
- The specific vocational rehabilitation services to be provided in order to achieve the established rehabilitation objectives,
- The terms and conditions for the provision of vocational rehabilitation services including: financial responsibilities of the handicapped individual in implementing the IWRP, the projected date for the initiation and anticipated duration of each vocational rehabilitation service, and any plan for post employment services,
- A procedure and schedule for periodic review and evaluation of progress toward achieving rehabilitation objectives, and
- The views of the handicapped individual, or his parent, guardian, or other representative, concerning his goals and objectives and the vocational rehabilitation services being provided.

The Developmental Disabilities Act (P.L. 94-103) requires that each person receiving services funded under the program have a written Individualized Habilitation Plan (IHP) which defines goals and objectives of the prescribed service program and states how and by whom multiple services are to be coordinated and delivered.

be developed jointly by rehabilitation agency staff, the service recipient, and when appropriate, his or her parents.

As do other plans, the IHP includes:

- Long-term and intermediate habilitation objectives including objective criteria for measuring the clients achievement,
- Services to be provided with dates for their inception and termination, and
- Role of the participant in plan implementation.

The 1978 Comprehensive Employment and Training Act (CETA) Reauthorization (P.L. 95-524) requires that a personalized employability development plan (EDP) be developed for all Title IIB and C participants. In establishing Employability Development Plans, the CETA prime sponsor is supposed to take into consideration an individual's skills, interests, and career objectives as well as consider the barriers to employment or advancement faced by the individual in attaining unsubsidized employment.

At the time of entrance into the program, a strategy including appropriate training and support services is developed with the goal of assisting the participant in entering unsubsidized employment. Each plan must identify services to be provided (subject to the availability of services) to meet individual needs as well as an individualized plan for making the transition to unsubsidized employment. The plan for accomplishing this transition is expected to be general at first and more specific as completion of program participation nears.

In addition, the Job Corps which is also authorized under Title IV of CETA requires the preparation of an employability development plan for each Corpmember prescribing training services directed at placement readiness and direct placement in employment wherever feasible.

The Work Incentive Program (WIN) Authorized under Part A and C of Title IV of the Social Security Act as amended in 1971 also requires development of an Employability Plan (EP) for each employable adult welfare recipient who registers for the program. This Employability Plan which is developed by the WIN employment and training agency and the Welfare Agency's Separate Administrative Unit (SAU) for WIN and the registrant, is based on a joint-staff assessment of the registrant's employability potential. The plan sets forth the registrant's employment goal, training, employment and social service needs, and the timetable for meetng these needs. Since the 1971 Amendments, which shifted the WIN program from training for employment to immediate employment whenever possible, services have been limited to those which contribute directly to immediate job placement. The EP should contain the following information:

- A specific employment goal,
- A summary of the registrants work and education history, statement of present skill level, and any need for testing,
- Social and employment service needs necessary to obtain employment,
- Timetable for services, and
- Roles and responsibilities for respective agencies and the registrant.

The National Apprenticeship Act requires the development of written apprenticeship agreement between the apprentice and either his or her employer, or an apprenticeship committee acting as an agent for the employer(s), which contains the terms and conditions of the employment and training of the apprentice. The agreement also includes:

- A statement of the trade or craft in which the apprentice is to be trained, and the beginning date and term (duration) of apprenticeship,
- A statement showing (1) the number of hours to be spent by the apprentice in work on the job, and (2) the number of hours to be spent in related and supplemental instruction which is recommended to be not less than 144 hours per year,
- A statement setting forth a schedule of the work processes in the trade or industry division in which the apprentice is to be trained and the approximate time to be spent at each process, and
- A statement of the graduated scale of wages to be paid to the apprentice.

The proposed Youth Act of 1980 would have placed heavy emphasis on the development of long-term strategies for educational and employability development. Many of the assumptions underlying the design of the proposed Youth Act are currently being tested by 14 prime sponsor jurisdictions throughout the Nation under the Consolidated Youth Employment Program Demonstration Project (U.S. Department of Labor, 1980). The CYEPDP experience has been well documented and lacking other studies of individualized planning under CETA, provides an opportunity for an in-depth study of how individualized planning and long-term service delivery strategies can be incorporated into that system. The Demonstration Project serves youth, but the systemic problems identified are applicable to all CETA services and presumably to other delivery systems as well. Two caveats are required. First, the demonstration is now only in its second year so start-up problems and staff inexperience with individualized programming may have distorted the situation. Secondly, questions raised regarding the validity of long-term career planning for teenagers may not be applicable to long-term educational and rehabilitation planning for the handicapped and other special needs populations.

CYEPDP guidelines state that each participating youth is expected to acquire, through a progression of educational, experiential, and training activities, the minimum levels of competency necessary for successful transition to employment. Two program features central to the CYEPDP design address the individualization issue. These are the Employability Plan and Record (EPR) and Service Agreement.

The Employability Plan and Record is the written plan which is developed by the CYEPDP counselor and the youth which lays out the youth's long- and short-range employability development goals, documents progress against these goals, and serves as the youth's record of achievement during his or her participation in the program. EPR development begins initially when the youth enters the program and continues through a ongoing process assessment resulting in revisions of the plan as appropriate during the course of the youth's participation. The CYEPDP paper states that the EPR:

- Guides the youth's participation in the program by providing a course of action for the youth to follow,
- Guides the CYEPDP counselor by providing a step-by-step implementation plan for the individualized service strategy or developmental sequence of activities, and
- Provides the documentation against which individual achievement and program effectiveness can be assessed.

The EPR contains:

- Intake and eligibility documentation,
- The youth's long-range and immediate employability development goals,
- The youth's competency levels at the time of initial assessment,
- The youth's educational work history and data on his or her characteristics,

- The youth's competency objectives,
- The rationale for the competency objectives,
- The planned service strategy for achieving competencies, and
- Competency gains identified through periodic reassessment.

Furthermore, under CYEPDP, service agreements(s) between the participant and the deliverer of service are to be developed consistently with the EPR.

IMPLEMENTATION EXPERIENCE

The remainder of this paper deals with successful elements of program implementation as well as issues and problems identified by educators, CETA prime sponsors and others involved in trying to implement individualized planning requirements. Many parallels exist between experiences despite the fact that there are several basic differences in the importance accorded individualized planning requirements and the nature of how they are implemented. The major differences between the delivery systems concern:

Importance

- The IEP is the written statement of how a school district will meet its legal obligation to the handicapped student in providing him or her with a free and appropriate public education. It is the central controlling mechanism for this activity.
- Although assessment and personalized planning are encouraged under CETA, the EDP is a program adjunct which assumes relatively little importance within the CETA delivery system.

Short- and Long-Term Objectives

- IEP's are prepared annually for each student during the entire course of his or her educational program. The IEP therefore deals with annual educational goals and short-term (one year or less) learning objectives which are not usually considered final program outcomes.

- The EDP goals and objectives are stated in terms of anticipated final outcomes except for in-school youth who may be planning to return to school. The almost universal anticipated outcome is placement in an unsubsidized job in a specific occupational setting.

Level of Specificity

- One level of planning deals with selection of service components to meet individual needs; another relates to tailoring instructional and service components to individual circumstances.

  The National Association of State Directors of Special Education describes these two levels as follows: (1) a total service plan, and (2) the individual implementation plan. The total service plan includes areas of educational need and present levels of performance, long-range goals and annual goals, recommended placement, support services, and personnel responsible for IEP implementation. The implementation plan includes instructional objectives, methods and materials to be used, lesson plans and student evaluations, instructional tasks, and other designs and devices used by the teachers under P.L. 94-142 (Youthwork, 1981, p. 42).

- For the most part, prime sponsors have often dealt only with the service plan level in a rather general manner.

Experience to date will be considered in terms of the following objectives for which individualized planning and service delivery have been promoted:

- Making service prescriptions more appropriate to meet individual needs,
- Helping secure needed services,
- Strengthening participant and agency accountability, and
- Documenting participant achievement.

Making Service Prescription More Appropriate to Meet Individual Needs

Individualization presumes a change in the basis for program planning from one based on the needs of the categories of clients to one focusing on the needs of individuals unrelated to the broader classifications into which they may fall. CETA eligibility is determined almost entirely on economic criteria with the assumption being that those with the lowest income often have the most urgent need. In addition, groups of individuals presumably needing special services called "significant segments" are identified based on demographic rather than need characteristics. Such significant segments include but are not limited to, the handicapped, teenage parents, juvenile offenders, individuals suffering from substance abuse, and dropouts. The National Council on Employment Policy (1980) would suggest that the operational goal of CETA has been to serve greater numbers of individuals within these groups rather than to meet the particular needs of members of each group. Not surprisingly, the Council found that during the first year and a half of YEDPA implementation, prime sponsors did not do much to increase the number of special needs participants and did even less in developing services to meet their needs where such "tailoring" would have been appropriate.

Similarly, a study on local implementation of P.L. 94-142 found that even though one of the intents of the law is to decategorize planning and service delivery, it has been difficult to do so because the system is so firmly rooted in classification by type of disability (SRI, 1980). These classifications include the visually and hearing impaired, the learning disabled and the emotionally disturbed, and others.

Planning specifications and service patterns attest to the categorization of program delivery. For instance, under CETA youth programs, despite the emphasis on assessment and individualization, employability development goals, especially for 14-16 year olds, tend to cluster around several basic themes. These themes include: need to gain labor market experience, need to gain more knowledge of the labor market and career options, and the need to explore occupations. Goals for older youth are more likely to involve preparation for a specific occupational area.

Services similarly tend to follow relatively predictable patterns by age groups. Although between five and ten types of services were offered in the CYEPDP sites, participants tended to be regularly placed in work experience, with career exploration and preemployment services following in frequency.

Under P.L. 94-142, special education services provided to handicapped children differ both by age group and by type of school. Preschool children are more likely than those in other age groups to receive speech services and motor training. The older the age group, the greater the emphasis on reading and math. Children in special schools, more often than children in regular schools, receive special education services in such functional areas as social adaptation, self-help skills, and motor skills (Technical Association and Training Corporation, 1980).

The existence of these patterns is by no means a condemnation of the service delivery systems because service needs clearly vary depending on the age and the stage of educational and employability development of the individual. For instance, EDPs for many young people are based more on their interests than their actual vocational goals. Thus the goal of the EDP may well be to help youth develop more realistic career goals through labor market exposure and career exploration. Age classification only becomes a problem when service prescriptions are rigidly tied to the youth's classification. The real need for individualization probably occurs more within the broadly stated service categories than in deciding between one or the other. For example, although most 14 and 15 year olds probably need to explore jobs and gain work experience, the type of occupations that should be closely explored and the nature of the work experience planned should be tailored to the particular interests and aptitudes of the individual youth. Similarly, development of basic reading skills among special needs populations needs to be structured to accommodate the youth's current level of reading and comprehension rather than his or her age or disabling condition.

Diagnostic procedures in some areas of competence are further developed than others particularly in our ability to link assessment results to prescription of service. For instance, assessment methods for measuring educational and occupational skill attainment are more highly refined than those for attitudinal adjustment and other behavioral skills which commonly are called work maturity. Furthermore, such diagnostic procedures can most appropriately be used for placement in instructional programs when those programs are competency-based and structured to accommodate student entry at various levels of assessed competency. Where curriculum does not allow this flexibility, diagnosis and prescription become much less precise and more dependent on the kinds of services that are available than on what is needed by the individual.

The overall low level of congruence between assessment and service prescription is illustrated in the CYEPDP experience. Of the records sampled during the first year of operation, only 19 percent contained adequate assessment information for comparing assessment results with the service unit in which the individual was placed (Technical Assistance and Training Corporation, 1980).

Not only are assessment methodologies not always useful for diagnostic purposes, but the capacity of the education and employment systems to maintain an adequate assessment capability is equally or more limited. With tight budgets, school systems have tended to either cut back counseling and guidance staff or rely on that staff to perform many administrative functions that divert them from the counseling function. Those counselors that remain are often inadequately prepared for dealing with special needs populations and vocational or career assessment.

P.L. 94-142's IEP requirement has placed a heavy burden on the assessment capacity of school districts. Since the enactment of P.L. 94-142, districts have adopted more formalized comprehensive and structured assessment procedures, resulting in a substantial backlog of children awaiting assessment. Based on state projections, the situation is not likely to improve because the areas of shortest future supply of personnel will be teacher aides, psychologists, and diagnostic staff (U.S. Department of Education, 1980). One attempt to improve this situation has been the Office of Special Education's Regional Resource Center (RRC) program which trains teachers, administrators, supervisors, counselors, and parents in educational assessment programming for handicapped children. The Centers also provide assistance in developing and demonstrating materials and techniques related to IEP's.

Recognizing the need for a strong counseling and assessment component in its in-school programs, YEDPA required that to the extent necessary, CETA funds going to local school districts under interagency agreement provide for school-based counselors to carry out the assessment and other counseling provisions of the program. An unintended contribution of YEDPA has been increased pressure on school personnel to focus attention on the value of counseling (Butler and Parsons, 1980).

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Assessment capabilities within CETA are limited by staff as well as the organizational structure of the delivery system. CETA servcies are, for the most part, delivered through subcontract arrangements with numerous agencies within the community who do their own intake, assessment, and placement in service components. Staff in these subagent organizations often do not know about programs other than their own and more importantly, are more concerned with meeting their own recruitment goals than finding the most appropriate placements for their applicants. As a result, CETA prime sponsors have increasingly turned to centralizing intake and assessment functions. With the assistance of computers and the greater use of standardized testing instruments, centralized as well as decentralized intake and assessment functions have grown more sophisticated, enabling prime sponsors to better match participant needs with available resources.

The Department of Education, Office of Special Education has also moved to centralized assessment services with "one-stop" Direction Service Centers (DSC) which work with families to directly match the needs of their handicapped children with appropriate services available within the community. In fiscal year 1979, there were 25 such centers.

Problems related to information sharing between agencies resulting from the Privacy and Freedom of Information Act of 1975 often preclude joint development of EDPs and joint utilization of assessment and program data on individuals. For example, under CYEPDP, school-based personnel often were reluctant to include problems or "barriers to employment" (especially related to health problems) on EPRs because of legal constraints (Technical Assistance and Training Corporation, 1980). In addition, there are simple logistical problems of sharing records when staff are not co-located and do not meet regularly either on a team or other basis.

Helping Secure Needed Services

Parents continually challenge school systems on the quantity and quality of services they consider their children to be entitled to as part of a free and appropriate public education. Because of this pressure, the debate over what constitutes related services under P.L. 94-142 is far from over. The Second Annual Report on Implementation of P.L. 94-142 (1980) concluded that overall, the number of handicapped students receiving related services was lower than the number actually needing services. One special education supervisor summed up implementation realities by commenting: "What is appropriate is what's available (SRI, 1980, p. 77)."

Since employment and training programs are not entitlement programs like P.L. 94-142, the question of what services to provide is less of a political issue. Department of Labor regulations have caused prime sponsors to limit service only to those who have the most need to assure accomplishment of the specified individual employment goal. Whenever possible, the shortest and least costly appropriate service is to be provided. The WIN Handbook (U.S. Department of Health, Education, and Welfare, 1979) is clear on this point. It states that the employment training program should contain "a specific employment goal attainable in the shortest time period consistent with employment and social services needs, project resources, and job market opportunities (U.S. Department of Health, Education, and Welfare, p. 11)." The problem is that although individualized planning is supposed to result in the provision of appropriate services to meet client needs, it often ends up reflecting only what the system can provide.

Services can be provided either in-house or by accessing services provided by another agency. Such accessing may be accomplished through financial interagency agreements providing for cross-program, slot buy-ins, or through formal and informal non-financial arrangements. Under P.L. 94-142, few program buy-ins occur, but under CETA and WIN they are used rather extensively. Since prime sponsors are urged to use appropriate community services both with and without reimbursement, they are required to prepare a complete inventory of community resources as part of their annual planning requirements.

Experience has shown that interagency coordination cannot be achieved through formal planning exercises such as community resources inventories and legislatively mandated linkages. When staff are not familiar with the services provided by other agencies, and do not have a personal relationship with other agency staff, cross referrals are unlikely to occur. Although staff exchange information, jointly developed policies, and interagency and interdisciplinary teams have helped bring about improved utilization of resources, to date they have not done enough.

One major initiative in this area has been the Department of Education's support of 13 Regional Resource Centers (RRCs) to work with states to improve cooperative planning among the various agencies serving the handicapped. As a result of a February, 1979 conference on coordination, 20 states worked out collaborative agreements based on an Office of Special Education coordination model particularly designed for secondary school level programs that serve handicapped students. Similar initiatives have been undertaken with other community and health service systems including the Rehabiliation Service Administration and the Office of Vocational and Adult Education (U.S. Department of Education Report, 1980).

When facilities are limited, individuals who are treated categorically in terms of their handicaps or disadvantages are directed to facilities in the community that serve that particular type of category. Once placed, services are limited by what can be made available within that facility.

Because of inflexible programming, even more broadly targeted school-based and other programs often cannot adapt programs sufficiently to meet individual needs and begin new classes when needed. Long-term school planning cycles, heavy reliance on fixed capacity classroom and training facilities, uneven adoption of open-entry open-exit curricula, and inflexible school personnel systems make it difficult for vocational educators and other school personnel to respond to expressed needs in a timely manner.

Staff become cynical and frustrated by the limits on what they can do. However, they learn to cope with situations beyond their control, such as: limitations on allowable duration of services, interagency accessing problems, and the lack of service options available within communities. Under CYEPDP, when services were not available, especially those related to a specific occupational goal, counselors tended to focus individualized plans on developing good work habits and establishing a work history. With such broadly stated goals, virtually any type of work experience was appropriate. Likewise, under P.L. 94-142, when resources and facilities are limited, identified needs tend to fall only within available service categories so that agencies are not held legally liable for what they cannot deliver.

Stengthening Participant and Agency Accountability

Agency "coping behaviors" are part of the context within which programs are delivered and individualized planning requirements implemented. Broadly stated goals such as those found in many individualized plans hardly provide the basis for strict management processes that measure program effectiveness or set standards for participant or student achievement.

In a way, development of an individualized plan with and for a child or participant does however, contribute to a heightened sense of program purpose and direction because it creates a more personal bond between the counselor representing the system and the individual needing a service. Efforts on the part of the counselor to see the plan implemented, make the counselor an advocate for the rights or needs of his/her clients (Walker, 1979). Unfortunately, counselors and other staff often do not have the institutional clout to deliver on the plan they have made with their clients.

Without clear performance standards that are applied consistently, youth often do not know what is expected of them within the program or society. Without standards there is no opportunity to earn rewards for good performance. Butler and Parsons (1980) suggested that the lack of continuity among programs and service providers, and lack of consistency in standards for individuals and programs is why programs fail to adequately serve special needs populations.

Increasing personal involvement in goal setting and implementation is not enough. Without a management system to support individualization and a planning system which creates the necessary flexibility in service delivery, attempts at increasing accountability and effectiveness will give way to perpetuation of the number game for measuring success. Without finding ways to make individualized planning cost-effective and logistically feasible, the potential benefit of individualization will be out-weighed by the problems associated with it.

Programs need to be planned, managed, and evaluated based on their ability to help people achieve their individual goals. Counseling and other staff functioning on their own or within teams should be supported by management systems that facilitate case management and individualized participant or student tracking. Rewards and incentives should be incorporated into management systems to strengthen effective practices and programs, and staff development and staff assignments should be geared to enhancing each agency's capacity to better serve individual needs.

In reality, for individualized planning and the tracking of individual progress to occur, assessment information and processes must be sufficient to permit pre- and post-assessment. Specified learning or employability development objectives must be stated in terms against which individual progress can be measured during the time the person is in the program. The longer-term the objectives are, the more difficult it will be to meet either of these conditions. One of the implementation areas needing particular improvement under P.L. 94-142 is the development of criteria for determining the extent to which short-term objectives are being achieved (U.S. Department of Education, 1980).

It has been argued that both programs and individual participant performance should be measured in terms of gains made rather than ultimate outcomes achieved (Technical Assistance and Training Corporation, 1980). The CYEP Demonstration Project as well as a number of CETA MIS "enhancement" projects have sought to develop both the framework and operational mechanisms for measuring participant progress. The CYEPDP concept paper uses the term "benchmarking" to cover both the development of the framework for defining, measuring, and documenting individual achievement and the assessment process itself. The paper points out that it is important to strike a balance between the detail and specificity needed to measure incremental gains in an individual's competencies and the generalizability and acceptability of broader statements of competency (Technical Assistance and Training Corporation, p. 15).

Traditionally, CETA program effectiveness has been measured by the degree to which participants have been placed in unsubsidized employment or returned to schools. This method of measuring success has been criticized especially for youth programs because many of the activities are developmental, contributing toward long-term employment success rather than immediate placement. The standards governing CETA and WIN force the system toward the selection of applicants based on their ability to become employed within a short time with minimal assistance.

IEPs and EDPs are similar to contracts in that they identify the steps to be taken in implementing the strategy and eliminating the misunderstanding about the obligations of the participant and the system. They serve as management tools for monitoring and evaluating the counseling process, and the provision of services and the participant's progress toward attainment of the stated occupational goal as a consequence of these interventions. A systemmatic review of implemented individual plans can also make it possible to evaluate the effectiveness of different types of services and service deliverers.

Under CYEPDP a further step was taken to bring accountability to the service deliverer level by requiring service deliverers and participants to sign service agreements. These agreements formally outlined roles and responsibilities regarding the specific service or group of services to be delivered, the expected outcomes to be achieved by the participant stated in terms of competencies to be gained, the expected duration of the service(s), and the projected schedule to be adhered to by participant and service deliverer. Similarly, under WIN, the Employability Plan (EP) actually contains two parts: The employment and training plan which is the responsibility of the employment and training agency and the social service plan which is the responsibility of the welfare agency. Plans are developed and modified if necessary by the two agencies with input by the registrant. However, each agency has authority only over its portion.

Documenting Participant Achievement

Neither the education nor CETA systems have fully exploited the potential programmatic and management benefits that can be derived from documenting achievements of individuals during the course of their program participation. This information can be used for purposes of internal case management as well as articulation between systems and activities. In addition, it is potentially useful as a tool to build discipline into the system. It can also be used to communicate participant qualifications to employers and others and thereby building program credibility within the community. Perhaps the most progress in using participant information for program purposes has been made by migrant education and training programs in which student or participant information goes with the individual from one location to another. However, internal planning and management procedures are not designed to use individual client data either in an aggregated or disaggregated form. Many CETA Management Information Systems (MIS) lack the technical sophistication to call up previously stored program information especially when services were delivered by another school district or prime sponsor agent.

Prime sponsors and school systems are now beginning to work more intensively with private sector employers to open up areas of communication both in the way employers define student expectations and in how programs describe the learning and experiences that have occurred within the program. To a much greater extent, articulation has already occurred between secondary and postsecondary programs so that the documented achievements in one system can be accepted by the other.

With large numbers of students not gaining high school diplomas or other formally recognized educational credentials, the importance of recording and communicating an individual's non-credentialed achievements is of major importance and potentially one of the strongest arguments for requiring individualized planning and record keeping for program participants.

CONCLUSIONS AND RECOMMENDATIONS

Given the limitations discussed previously, can one expect education and other service providing agencies to deliver appropriate individualized services for all youth in need? Will enough resources be made available to serve all youth? Which system, if any, will get the money to do so, and who will provide the money? Will performance indicators and funding formulas allow service providers to serve only those that can be helped inexpensively and quickly? The answers to these questions lie as much in politics as in improved program planning. Yet, without more serious attention to program planning and coordination, individualization of services will be relegated to the status of wishful thinking instead of becoming an operational reality.

The following recommendations are directed at five areas of critical concern that may help systems move in the desired directions in a realistic and timely manner:

1. **Staff Development**

If staff are to assume expanded roles of learning coordinators, service brokers, and managers of individualized programs, they must be helped to learn and practice these roles with other personnel within their own agencies and their counterparts in other agencies. Staff development, staff networking, and staff exchange policies should be given priority within agencies. Such activities should be undertaken on an interagency/interdisciplinary basis involving on-board staff as well as those preparing to enter the profession.

2. **Technology**

Further work should be done in developing methods of applying modern technology to make individualized planning, participant tracking, and program flexibility feasible and cost-effective. These areas offer tremendous operational benefits:

- Computerizaton of available community resources to facilitate matching participant need with available service.
- Automation of participant or student record keeping systems to permit: tracking of individual progress, improved caseload management, and development of long-term strategies involving a continuum of service.
- Computer-assisted guidance and instruction to provide for a range of instructional and guidance opportunities otherwise not available.

3. **Assessment and Instructional Methods**

Additional work should also be done in developing competency-based assessment and instructional programs especially related to employability skill development. Instructional methodologies, curriculum, and assessment procedures should be shared as appropriate between Job Corp, CETA, vocational education, special education, and other programs. When new instructional modes need to be developed, joint efforts should be undertaken. When employment and employability goals are concerned, employers should be involved.

4. **Formats and Procedures**

Agencies serving youth and other populations needing individualized program services should work out arrangements to facilitate the sharing of client information. Such arrangements should include agreement on assessment procedures and instruments, formats for individualized planning documents, and definitions of terms to be used. In some cases interagency agreements might be written to formalize the agreed upon procedures.

5. Program Planning

Agencies should work more closely in defining their roles and responsibilities in working with client populations. Together they should set priorities and organize to assure that the necessary range of services is made available within communities to meet the individual needs of target populations.

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Personnel Development Policies and Practices: Enhancing Interagency Service of Special Needs Populations

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Our nation is now suffering from high unemployment but an even more fundamental issue affects millions of Americans--unemployability. Not only do these unemployed suffer the trials of diminished living standards, many lose their self-esteem knowing that they are not contributing members of society. Meanwhile, working members of our society must carry much of the financial burden that supports the unemployed through various channels financed by federal taxes (Office of Occupational Development, 1980). This is an old and familiar problem, which has emerged to become a priority issue among educators, especially those in vocational education who work with special needs students.

One of the unique, but confusing aspects of providing vocational training to handicapped, disadvantaged, or limited English-proficient individuals is the fact that not one, but several organizations are involved to some degree. Special needs students require and are entitled to appropriate vocational training. This training is usually provided by persons specially trained in the delivery of education or rehabilitation. Therefore, it is evident that this arrangement of vocational services must be examined periodically, both from the standpoint of the organization in which the trainer operates, as well as the preparation given to that trainer. That is the purpose of this paper: To examine the basis for personnel preparation in the various organizations which provide vocational services to these categories of special needs students. The legislative foundations for four different organizations or agencies which have similar outcome objectives will be examined. These individual organizations are: CETA, special education, vocational education, and vocational rehabilitation. The possibility of interagency cooperative activities, along with potential barriers and facilitators to bring this about will also be examined. In addition, also investigated will be a list of suggested competencies for special needs vocational trainers, and two hypothetical approaches will be proposed to increase the capabilities of agency interactions through the training of staff from all four agencies. The basis of both these approaches originates from a philosophy that continuity of services from any one agency to its clients is desirable.

Implicit in our discussion of the literature that has been examined on this topic is the sensitive, emotional topic of change. The facts are beginning to mount suggesting that future services to special needs persons will require changes in agencies and agency staff. However, before further conclusions are drawn, the need for examining this topic will be discussed.

Since the enactment of the Manpower Development and Training Act (MDTA) in 1962, the Congressional focus on training for employment has evolved toward a philosophy of decentralized federal control and increased local coordination. This philosophy was demonstrated by the passage of the Youth Employment and Demonstration Projects Act (YEDPA) in 1977, which focused on unemployed youth and school dropouts accessing both federal programs (Comprehensive Employment and Training Act, i.e., CETA) and local private sector employment. Most recently, Title IV of the 1978 CETA Amendments specified in even greater detail the mandate for agencies to pursue a coordinated approach to the problem of youth unemployment (Indiana Office of Occupational Development, 1980).

Vocational education has been evolving toward its present status since the passage of the Smith-Hughes Act in 1917. However, it was not until 1963 that the Vocational Education Act (VEA) defined the responsibility of public education for the entire area of employment skills preparation. The 1968 and 1976 amendments to the VEA included parallel emphasis on cooperation among public and private agencies similar to that specified in the CETA legislation of the 1970's. Mirengoff, Rindler, Greenspan, and Seabloom (1980) noted that better coordination and linking[1] of employment, training, and related programs are basic to the goals of CETA and the justification for CETA's existence. However, the potential coordination of federal and local programs with CETA has never been fully achieved by responsible local and state officials. Not only has CETA and its clientele suffered from inadequate or nonexistant collaboration with other organizations, current efforts by Congress and the Reagan Administration to reduce federal spending in all areas (except for defense) have motivated agencies serving vocational special needs populations to seek ways to maintain present levels of service while working with significantly lower funds. Ferrini, Matthews, Foster, and Workman (1980) believe that there are usually several service providers responsible for addressing the needs of the same clientele. These providers have not had success in pooling their resources or coordinating their programs, and often are not even aware of each other's programs. As a result, Ferrini, et. al., feel the services delivery spectrum of vocational preparation has the following characteristics: (a) many unserved or underserved clientele fall into the "cracks" between agency mandates, (b) inefficient use of resources, (c) poor or non-existent linkages between related services, (d) inadequate referral networks needed to help users locate services, and (e) excessive competition among related organizations for clientele and/or federal and state dollars.

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[1] Mirengoff, et. al, (1980) make a distinction between the terms linkage and coordination as follows: "Linkage refers to a cooperative arrangement to provide ancillary service or training... Coordination refers to (a) arrangements among various programs or agencies with similar objectives or (b) cooperation among agencies with different goals to promote the objectives of each" (p. 64). For the purpose of this study, the terms coordination, cooperation, and collaboration (i.e., to work with one another or others) are used interchangeably.

The situation among the handicapped appears to be not much better. For example, Regan and Deshler (1981) referencing Closer Look (1978) state that, "unemployment among disabled people far exceeds the rate in the rest of the population. In a typical year ... 60 percent of all disabled adults are out of work, compared to 25 percent of non-disabled adults."

Overcoming barriers to employment will necessitate coping with some very restrictive attitudes in society. Halpren (1979) suggested that career opportunities for the handicapped have been restricted by the limitations of professional imagination, commitment, and resources, more than by the limitations resulting from the individual's disabilities. Clearly, then collaborative efforts between agencies serving special needs individuals must draw upon their professional imagination and commitment to make better use of existing and potential resources than has been achieved to date.

Batsche (1979) feels that lack of cooperation is the result of a communication barrier between vocational educators and special educators that has not received the attention it deserves. This could probably be extended to include vocational rehabilitation staff as well. This problem also includes a lack of planning and poor or non-existent communications resulting in considerable duplication of efforts. It should be noted that these limitations plague all four agencies to varying degrees.

PARTICIPANTS IN THE PURSUIT OF INTERAGENCY COORDINATION

Before examining ways that promote or inhibit interagency cooperation, it is important to establish a common rationale, or purpose for this activity, and to look at the federal legislation which brought all four agencies into existence. First, the rationale for interagency cooperation.

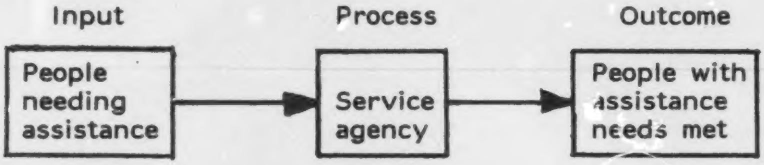
Efficiency (Efficiency from the perspective of the public agency -- or more likely, from their financial administrators). The source of this movement has been evolving for a long period of time. According to Boyd (1980) critics of fragmented municipal and educational services can be traced back to the Municipal Reform Movement of the Progressive Era (c. 1900-1914). The question of which approach to efficient operation is best, a centralized hierarchically organized bureaucracy or a decentralized system of small service providers who rely on competition and consumer choice, is unresolved at this time. In fact, as in most cases, there are trade-offs between efficiency in terms of dollars, time, effort spent, consumer satisfaction, and equality of resource distribution. Any reorganization of related social agencies to promote coordination and linkage of individual services to the public sector requires changes in both policy and practice on many levels.

A Roster of the Players

To even the most uninformed, taking a cursory view of occupationally-oriented training programs for adolescent and young adult populations, there would be superficially, little differences between vocational education and CETA. Further, this is only a slight difference between these two and vocational rehabiliation, but a greater difference when special education is considered. This observation seems accurate unless one examines closely the different client populations that comprise the typical caseloads of each agency. On a functional basis, these agencies can be viewed as a simple, input-process-outcome diagram as follows:

FIGURE 1

A Special Needs Client-Agency Services Delivery Model



The fundamental difference between these agencies, despite a similar *outcome*, is that *different* populations require *different* services in order to optimize their *chances* of arriving at the same outcome. One of the differences between these agencies is due to the environments and procedures applied to these different populations. Considering the fact that environment and procedures influence the various populations differentially, it is the latter aspect that would appear to be a suitable candidate for modification. This modification would apply to the personnel who deliver their agencies' services to their respective clientele. Before pursuing this issue further, it will be necessary to examine these different populations and the relationship of agency personnel who deliver vocational services to their clients, so as to achieve a better understanding of the problem.

Basically, this service consortium can be divided into two major arenas: general vocational development and specialized vocational development. To begin, the agencies of CETA, vocational rehabilitation (VR) and special education (SE) may be viewed as specialized vocational training, in so far as the clients they serve are in need of specialized programs and professionally qualified personnel to coordinate and deliver vocational training. All of these disciplines approach the delivery of vocational services from a personal or individual perspective. This is evident in the establishment of the entry of the client into the treatment process. Each program plan identifies specific services, procedures, and aids that will be required to maximize the client's vocational potential. Although each of these agencies has been created to serve atypical populations, these three services can be further delineated on the basis of client demographics.

CETA (Title IV), for example, primarily serves economically disadvantaged persons, with most of CETA's effort being focused on adolescents and young adults, age 16 to 22. Special education's attention has typically focused on persons at the elementary and secondary levels in public schools and institutions, with recent additional emphasis on early childhood services. Although vocational training is a specified requirement in The Education for All Handicapped Children Act of 1975 (P.L. 94-142), Heller (1981) points out that "programming for handicapped students at the secondary level has long been a neglected component of the educational continuum (p. 582)." Vocational rehabilitation services have been offered since the early 1920's, but only recently have included such major handicapped populations as the mentally retarded, severely handicapped, and most recently (1978) the learning disabled. Furthermore, with the passage of the Rehabilitation Act of 1973 (P.L. 93-112) priority has been given to serving the most severely handicapped persons and those who have been unserved in the past. A major characteristic of each of these populations is that they have been unable to develop into competitive workers when only regular vocational training is provided. That is, as a result of their "differences" in relation to the normal population, special or modified training experiences are required for them.

Finally, vocational education has been, since its inception with the passage of the Smith-Hughes Act of 1917, the general forum of vocational training available to citizens at the local community level. Only a few years have passed since Congress identified disadvantaged and handicapped populations as being in need of special vocational services (P.L. 88-210). Vocational education's performance in preparing vocationally competitive citizens up to that point in time had been extremely high, but has not served the special needs populations with equal success during the last 11 years (Olympus, 1974; Krantz, 1981).

Two reasons for this inadequate service to special needs clients has been the resistive attitudes among vocational educators (Halloran & Razeghi, 1981) and failure to accept more responsibility for serving special needs students in regular and modified vocational programs (Kayser, 1977; 1981). These actions may be traced back to the contrast between the philosophies of vocational education and special education or rehabilitative services. Vocational education's concentration has been on producing highly qualified workers to meet the labor demands of the community while special education focuses on optimizing the potential of an individual's ability through whatever methods and services that are individually required.

POSSIBLE CONTRIBUTIONS BY AGENCIES

More than a decade ago, Gallagher (1969) noted that in any complex social issue which requires a wide range of skills, the task cannot be accomplished by only one discipline: vocational rehabilitation, vocational education, and special education all have something to offer. Gallagher suggested that each of these specialists can bring the following differential skills to bear upon the complex problem of providing training and education programs for special needs clients.

- Vocational Rehabilitation. Being the closest of the three to actual job placement, these professionals could focus on vocational evaluation and counseling, general program objectives, applicability, and the provision of feedback on program effectiveness (p. 9).
- Vocational Education. This discipline offers planning and instructional skills related to general vocational education planning. These professionals can provide specific instructions in occupational areas designed especially for the handicapped with the aid of special services personnel to fit special needs students into regular vocational programs (p. 9).
- Special Education. This discipline can contribute a sense of continuity and programming related to the total educational program of the handicapped child. Of special significance is the fact that special educators have the final authority for the total design of the handicapped individual's educational programs so that they meet not only work-study needs, but related educational and social goals as well (p. 10).

Gallagher (1969) also suggested that vocational education programs designed for the handicapped face the problems of where and how educational coordination should take place. However, he felt that all three of these disciplines must be meaningful components in all vocational education programs for the handicapped or the quality of these programs will suffer. Gallagher's advice on interdisciplinary or interagency cooperation was as follows:

> "We need to be careful that we do not fall into the trap of cursing ourselves when complex organizational problems frustrate us. There is an enemy, a real enemy, but it is not our colleagues in related disciplines. It is ignorance of how to best organize ourselves to deliver services to the handicapped. It is this enemy to which all our energies and efforts need to be directed (p. 19)."

LEGISLATIVE GUIDELINES FOR PERSONNEL DEVELOPMENT

Each of the four identified service agencies has evolved as a result of federal legislation aimed at improving the lives of specific populations who have experienced difficulties in accessing services to meet their needs. This is especially applicable to vocational training, since we assume that such training will, indeed improve the chances of the special needs populations to access a better life style. These laws were written and enacted to provide special services to the individual, but they also include provisions for preparing trained personnel who deliver the vocational-related services. As was mentioned above, the focus of this paper is on developing linkages and cooperation between each of these service agencies. It should be noted, however, that agencies do not develop linkages and make cooperative agreements, people working in these agencies do. Since this is the case, it is important to view the legislation for personnel development from the perspective of interagency cooperation not only for training of pre- and inservice personnel, but for using training personnel from these four areas during personnel preparation activities. Thus, the following material briefly examines these laws from these perspectives.

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Comprehensive Employment and Training Act Amendments of 1978: P.L. 95-524

CETA is administered through prime sponsors, usually offices in local government, that are coordinated at the state level. Programs are organized at the local level where the population base is at least 100,000. CETA was developed on the assumption that better services can be provided through an administration at the "grass roots" level, since the needs of the local community are more readily identified.

The statutes make it clear that CETA funds are to be used for employment, "through the utilization ... of all resources for skill development available in industry, labor, public, and private educational and training institutions, vocational rehabilitation agencies, and other state, federal and local agencies, and other appropriate public and private organizations and facilities, with their consent (29 U.S.C.A. Section 831 [b])." Thus, the CETA administration acts as a broker of services in a sense, to secure appropriate and needed services for persons who meet their eligibility criteria for assistance.

With regard to training, however, Section 882-Training and Technical Assistance, states that funds are to be provided for "appropriate preservice and inservice training for specialized supportive, supervisory, or other personnel, and appropriate technical assistance with respect to programs under this chapter." Given the foregoing statement (Section 831 [b]) that local unduplicated agencies and establishments be used as placement sites for direct vocational training services, Section 882 can be interpreted to mean that the CETA administration staff would be the recipients of this inservice and preservice training. This would seem to make sense in light of the requirements of the participant's personalized employability plan (Section 845(a) and (b)). This plan is similar in many aspects to the Individualized Education Program (IEP) specified in P.L. 94-142, and the Individual Written Rehabilitation Plan (IWRP) from P.L. 93-112. However, the legislation is not clear on identifying who is targeted for this inservice and preservice training in contrast to the specific wording in the other three statutes under consideration here.

The Education For All Handicapped Children Act of 1975: P.L. 94-142

Contrary to the vagueness of the CETA legislation in regard to training, Section 1413(a)(3) of 20 U.S.C.A. (P.L. 94-142) clearly states that individual state plans submitted to the Office of Education must specify who will be given inservice training and for what purpose. It states in part "... provides for in-service training to general and special education instructional and support personnel ... to assure that these persons are appropriately and adequately prepared and trained ... to provide services as specified in the law." Furthermore, Section 1431, Grants to Higher Education, specifies that the purpose of this section is to train teacher trainers in fields related to the education of handicapped children, and personnel already teaching or about to teach handicapped children. Furthermore, Section 1432, Grants to State Educational Agencies for Traineeships, provides funds to states for the training of both teachers, and supervisors of teachers, as they are needed in these localities.

Also in contrast to CETA and vocational rehabilitation regulations, the language of the law does not require that outside, already existing agencies must be used to provide the training for either the staff or the clients being served.

The 1978 Amendments to the Vocational Rehabilitation Act of 1973: P. L. 95-602

The Vocational Rehabilitation Amendments as elaborated in 29 U.S.C.A. Chapter 16, have several features that are similar to provisions in the other three laws while some features are unique. Within the state plan, Section 721(a)(1)(A)(ii) authorizes states to establish joint programs with other state agencies so as to share funding and administration responsibilities. These other state agencies may include major public education -- both vocational and special, public health, welfare, and labor programs such as CETA. In addition, Section 722(a)(12) includes the specification that existing public and other vocational or technical training facilities or other appropriate resources in the community, such as existing rehabilitation facilities (ec. 721(a) (5)) be used to the maximum extent possible. Also, Section 722, defines the Individual Written Rehabilitation Plan ((a) (9)) and the requirements of coordination with other state and local agencies ((a)(11)).

This law also provides for training funds in the form of grants, primarily for preservice purposes, specifically to "...assist in increasing the number of personnel trained in providing vocational [related] services to handicappd individuals... (Sec. 763(a))." In Secton 774, various service areas are identified as being included under these training stipulations, including vocational, medical, social, and psychological service providers, as well as persons specially trained in providing employment assistance, job development, and placement services. Therefore, this law identifies personnel by area, who are responsible for direct rehabilitation services that are to be trained through grant monies.

One unique feature of this particular law appears in Section 721 (a)(7) regarding state plans. It specifies that each state establish and maintain personnel standards as well as standards governing facilities and personnel used in these facilities. This feature of P.L. 95-602 places vocational rehabilitation personnel and facilities on a similar level as that of vocational and special education in terms of certification requirements. These requirements have a tendency to separate these three agencies from the CETA personnel who are not required to be certified.

Title II Of The Education Amendments Of 1976: P.L. 94-482

The current vocational education legislation P.L. 94-482, has several additional features that overlap with the other three laws besides the basic emphasis on providing vocational training. These specfications are found in 20 U.S.C.A., beginning at Chapter 44, Section 2300. To begin, Sec. 2307 (b)(5) specifies that criteria must be developed and specified in the state plan, relating to the development of coordination efforts with manpower training programs conducted by prime sponsors established under the CETA Act of 1973. It would appear that since both of these acts relate to vocational training and employment outcomes, Congress felt justified in requiring coordinated efforts between these two agencies. However, neither the VEA nor the CETA regulations clearly delineate responsibility for initiating these actions, thus it could be assumed that cooperative efforts should be a mutual undertaking.

A second feature that makes overlap with other laws is the requirements in Section 2310 that: (a) handicapped persons be served, and (b) disadvantaged persons, including those with limited English-speaking ability be served in all vocational education programs. These provisions overlap with P.L. 93-112, P.L. 94-142, and P.L. 95-602 respectively.

Personnel development under the Education Amendments of 1976, Sec. 2355 includes a variety of persons who are engaged in direct service delivery of vocational training as well as supervisors and administrators but does not specifically address those persons who are directly working with any special needs student other than the teacher who works with limited English-proficient clients.

What is clear from examining these laws is that persons and content areas are well defined for only three of the four providers of service, special education, vocational education, and vocational rehabilitation. Since most, if not all, of the expertise of CETA personnel may be found in these other three programs, it would suggest that these existing training programs could be effectively and efficiently used.

BARRIERS TO COLLABORATION

Tesolowski, Rosenberg, and Hammond (1980) proposed that the vocational development of handicapped and disadvantaged individuals will require collaborative and coordination among the following: people, public and private agencies, legislation, and professional organizations. Such collaborative efforts to integrate service to special populations of people through federal legislative mandates, agency services, and professional organizations are vital components of the movement to better serve special clientele. Stedman (1977) has stated that lack of coordination increases the inherent competitiveness between agencies and special organizations and inhibits effective delivery of services to selected populations. Clarcq and Cattanach (1980) also support this position. Obviously, the ideal conditions as identified by Likert (1967) for enhancing interorganizational cooperation do not seem to exist at this time -- favorable attitudes, confidence, and trust.

Tesolowski, et. al. (1980) reported that the need to develop and improve cooperation between special education, vocational rehabilitation, and vocational education has already been the subject of formal discussion at the Commissioner level with the U. S. Department of Health, Education, and Welfare (HEW). A November 21, 1978 memorandum jointly issued by the U.S. Commissioner of Education and the U.S. Commissioner of Rehabilitation Agencies stated:

> "This memorandum announces a joint national initiative to expand and improve the service delivery system to handicapped individuals... It is a basic tenet of the State and Federal participants that the development of new interagency agreements among State Departments of Special Education, State Departments of Vocational Education, and State Rehabilitation agencies is critical to the achievement of the goal. It is the expectation of all of the participants that States will develop new agreements during Fiscal Year 1979 (Office of the Secretary, HEW, 1978)."

Tesolowski, et. al. (1980) also stated that collaboration between agencies serving special needs populations is of the utmost importance. Now that agencies have begun to recognize the commonalities of their goals for their clientele, professional staff within these agencies must begin to share their expertise while realizing the importance of the other service delivery agencies and overcoming the belief that their area of expertise is the only critical one (Aiken, Dewar, DiTomaso, Hage, & Zeitz, 1975). Cooperation among service discipline agencies will, hopefully, result in more comprehensive delivery of services along the continuum of education and training services. Eventually such an approach should improve services that eliminate unnecessary duplication of efforts, but most importantly, does not exclude needed services. It seems apparent that current legislation, financial restrictions, and societal attitudes all indicate that now is the time for all professionals serving vocational special needs populations to pursue more effective, concentrated efforts aimed at defining and interfacing their collaborative endeavors (Tesolowski, 1980).

Potential Barriers Within the Legislation

A critical component of Title II of the Education Amendments of 1976, the Vocational Rehabilitation Amendments of 1978, and the Education For All Handicapped Children Act of 1975 is that there is a specific, substantive content imparted to aspiring practitioners through either pre- or inservice training. This content, which is identified in each of these laws, pertains both to the subject matter and specific practices inherent in that profession. This is not the case in the CETA legislation. Furthermore, CETA's Section 882 does not explicitly specify who will receive this training. However, in a conversation with a state CETA official in Minnesota, it was learned that funds used under this section have been used for CETA staff for inservice activities provided by other CETA staff. In essence, while CETA shares activities and job titles similar to those in vocational education, vocational rehabilitation specifically, and to a lesser degree, special education, there are no stipulations in the legislation that individuals' training will utilize existing programs from any of the other three disciplines to meet staff's needs.

For example, all disciplines except CETA have developed professional roles which were established over a lengthy period of time. With only one exception, the professionals in these three areas expend from four to six years in preservice training. Even the one exception to this standard, skilled journeymen of a particular trade as instructors, possess experience that cannot be matched in other ways.

According to Intriligator (1978), interorganizational relations including collaboratives, cooperatives, or consortia, drawn together to increase the effectiveness of public education systems tend to diminish their major goal: the satisfaction of individual needs. Intriligator further stated that the general state of knowledge about interorganizational relationships acknowledges that a diversity of assumptions underlying cooperative relationships or arrangement is "good" almost by definition, and they promote greater efficiency, higher performance, and reduce the duplication of services (Warren, 1967). This type of thinking is used by leaders, especially *legislators*, who may be sequestered away from the real world and evaluate their world only in dollars and participant numbers.

Resistance to Interagency Efforts

One reason for the low levels of cooperation alluded to in the above discussion involves the established domains of service and clientele of these four agencies. From this perspective, each agency views their service as specifically designed for their clients. Eventually this procedure evolves into very specific services, unique to the individual agency and clientele. This results in the acceptance of a specific clientele and rejecting all others who were viewed as atypical. These atypical individuals are then referred to other agencies for help. This perspective is also perpetuated in teacher/counselor preparation programs. An example is the dearth of vocationally-related components in special education programs or the absence of efforts to introduce the handicapped to vocational educators. Likewise, special education provides services for children, not adults. The older handicapped are the "rightful" domain of the vocational rehabilitation managers.

By maintaining a narrow focus on clientele and their required services, the content and methods of teacher/counselor programs become very specific and refined. While the positive effect of this evolution results in better services for one specific group of clients, the corresponding negative effect is that more and more "other group" persons are excluded from these services. Thus, it may be observed that if any of those agencies were to provide their standard services to another agency's clients, the treatment would not be as effective as for the individuals who were the recipients for whom the services were initially designed. This would tend to indicate that such differential services to populations are necessary.

Recently, advocates for handicapped youth have attacked this procedure stating that these youth are systematically excluded from vocational training (Halloran & Razeghi, 1981). They state that one reason for this exclusion is the reluctance of the vocational instructor to work with students who need extra assistance since they have not been trained to work with this clientele. Such reluctance is a rational reaction that could have been predicted years ago when the mandate of P.L. 94-482 was new and orientation courses were unavailable. However, with the availability of various inservice courses to familiarize instructors with these special needs clientele, such continuing reluctance must be interpreted as a formidable barrier resulting from unaccepting attitudes.

Based on enrollment figures, one observes an implicit resistance to serving disadvantaged students as well (Lee, 1975). This group, however, has several limitations which have not been addressed adequately to date. First, there have been few organized advocates for this group which could promote vocational education with equal zeal as for the handicapped. Second, the only educational area emphasized for the disadvantaged group has been Title I of the Elementary and Secondary Education Act, which has specifically focused on improving early education programs. Thus, while the disadvantaged population makes up a potentially large body of learners, there are not curriculum content or methods areas which give emphasis to their special learning needs.

Cooperative Governmental Agency Efforts

Albright, Hasazi, Phelps, and Hull (1981) observe that current federal and state level activities promoting interagency cooperation are only at an "embryonic" stage at this time. Several ageements have been formulated at the federal level between responsible governmental agencies, but fewer agreements have been developed between state level agencies. Surveying the 50 states, these authors noted that a major concern at the state level was how effective are, or will be, state level agreements in stimulating future comprehensive programming at the local level. For example, CETA, vocational rehabilitation, and special education all require clients to have some form of individualized program plan which specifies the nature and substance of required services. Since each of these agencies are required to submit state plans identifying cooperative efforts, it would seem likely that these individual program plans will reflect this cooperation as well. The authors noted that while some colleges and universities have initiated efforts to train professionals in related agencies to work with handicapped persons, considerable effort in this area is still needed. The driving force behind the current emphasis on collaborative agency efforts can be traced to the federal government. State governments, in turn, are required to submit their one or five year plans stating how they will comply with federal guidelines. However, it is at the lowest level, i.e., the local level, where individual clients are served, and that the actual efficiency and effectiveness of such collaborative efforts are measured. The most critical link in this service delivery chain, then appears to be at the local level where these mandates must finally be carried out, but where sufficient expertise may be lacking.

Collaborative efforts appear to have good intentions, as implied by examining areas such as, "problems of overlapping and duplication of services, shortages of state dollars, lack of federal financial support to implement regulations, and diversification of responsibilities over many agencies ... forcing states to reexamine their pattern of delivery of services (Burkhalter & Waldon, 1981)." In the rehabilitation arena, participation in networks is uncommon. Here again the major reason for this barrier appears to be the "people problem." This includes factors such as personnel attitudes, unwillingness to share information (competition between agencies), personnel overload in terms of extra work, and extra requirements to yet another level of bureaucracy. The second problem they identified was the geographic separation between the agencies involved. This factor could be especially critical if some agencies were local, some regional, and others statewide. There is consensus among several authors that in order to facilitate any kind of collaboration effort, planners must form an intermediate bureaucracy level above the local and below the state level (Albright et. al, 1981; Burkhalter & Walden, 1981; Intriligator, 1978). Intriligator (1978) has stated that since educational leaders hold positions at several levels of the school governance system, i.e., local and intermediate levels, cooperative efforts are thus facilitated.

This is an interesting dilemma, as was the specialized training for staff resulting in little cross-agency integration. The establishment of an intermediate level means that another level of bureaucracy is established, with all its demands for money, time and manpower, its development of cooperative policies, procedures, and practices, which consequently take away from the original effectiveness and efficiency the individual agency had previously achieved. One additional, yet fundamental, problem might be identified with the development of cooperative efforts; that problem is social change. The two basic principles of social change that would apply to the formation of collaborative networks are number of persons involved, and the involvement of persons at the level where the proposed change is to occur (Zaltman & Duncan, 1977).

Number of persons involved. Zaltman and Duncan (1977) state that the efficiency of the change process is directly related to the number of different people involved. Several examples of this principle have already been alluded to above. For example, two federal cabinet officials can issue a joint memorandum informing others of their concern for the establishment of cooperative efforts. However at lower levels in any two agencies, there will be a diminishing percentage of mutual agreement between local staff, simply based on numbers. Albright, et. al., (1981) referenced a list of activities identified as important for establishing interagency agreements designed by Tindall, et. al. (1979). The first three activities are opposite in terms of establishing substantial change between agencies. These include: (a) appoint a representative from each agency, (b) seek representatives from various levels of programming from the participating agencies, and (c) seek memberships from advisory committees, liaison groups, and advocacy organizations (p. 586)." In principle, this procedure is altrustic but in practice it may be self-defeating.

Involvement of personnel at the local level. The local level is where the final responsibility for change is to reside. It is also where the greatest effect of change may be observed and realized. A cardinal principle for effecting change is to involve the people at the level of responsibility where change is to take place. Basic to effecting change among local agencies, is the need to inform participants of each agency of their relationships to other agencies. Since this has been noted as a problem area in the above discussion, subsequent change at the local level seems doubtful.

UNMET INSERVICE NEEDS OF AGENCY PERSONNEL

Bowen (1980) has reported that teacher education is faced with a number of challenges in preparing teachers and other educational personnel to meet the mandates established by state and federal vocational and special education-related legislation. She believes that several of the problems in teacher preparation programs exist because special educators and vocational instructors have traditionally been trained without interaction with one another. That is, educators in each group function in ignorance of the other group with little or no coordination of efforts to improve services for special needs learners. The comment by Sparks and Younie (1969) that few institutions have recognized the vocational/career preparation needs of special populations is still valid today. Only a few colleges and universities, which recently became aware of the problems of educating personnel to work with special needs students, provide teacher preparation programs.

Bowen (1980) also noted that a limited number of research and development projects are being conducted that examine the role of special needs personnel. Most of these studies have focused on ways in which to develop the skills and leadership abilities necessary to work effectively with special needs individuals at the secondary and postsecondary levels and, thus, expand the vocational and career options of those special needs populations.

Holmes (1975) reported research efforts which led him to conclude that there is a lack of role definition and little desire to clarify those roles among personnel from all three agencies -- special education, vocational education, and vocational rehabilitation. In addition, he concludes that this research supports the need for cooperative agreements among these agencies and that meeting the needs of special needs individuals is not an endeavor which should be approached by agencies or individuals in isolation.

Categorizing Competencies and Inservice Topics

If cooperative interagency efforts aimed at serving the educational needs of a variety of special needs populations are to be carried out effectively and efficiently, the planning of these efforts must be planned logically to deal with the wide range of complex issues and problems. In addition, personnel involved in such agency or institutional activities must possess adequate competencies in appropriate areas.

In 1980, Peak and Brown noted that a demand has arisen in recent years of specialized training for vocational educators. This training must facilitate the service of students with "special needs" who are enrolled in regular vocational programs. The authors stated that this concern is shared by educational planners at local, state, and national levels. Since the eventual educational achievements of students are greatly influenced by educators, they, along with other agency personnel with parallel concerns, must possess the competencies and skills necessary to serve special needs populations.

Despite legislative mandates that were established during the 1970's to serve students with wider ranges of abilities, handicaps, and cultural/linguistic needs, recent studies have shown that teachers are not being prepared to cope with these issues during their initial teacher preparation programs (Phelps, 1976; Hamilton & Harrington, 1979; Reynolds, 1980). Peak and Brown (1980) reviewed numerous studies of special needs-related educator competencies and found competency lists containing from 16 to 384 competencies. However, individually, none of the competency lists was felt to be comprehensive or complete. Through an analysis procedure utilizing several experts from the vocational special needs field as resources, many of the previously identified competencies were assembled into a matrix model incorporating 12 categories or "domains." Each of the 12 competency areas was further reduced into four specific stages common to all major educational activities: (a) needs assessment, (b) planning, (c) implementation, and (d) evaluation (See Figure 2).

The needs assessment phase focuses on a person's ability to *identify* and *measure* a client's educational needs. The planning phase focuses on the ability to *plan* and *prepare* activities and materials while the delivery phase concerns skills related to the *implementation* of *delivery* of planning activities and materials. Finally, evaluation refers to *determining* the effectiveness of materials and activities used to meet specific identified educational needs.

Each of the 12 domains of skills listed in Figure 2 must be possessed by at least one member of the interagency group serving the special needs client. These competency domains are defined as follows:

1. *Teaching styles versus learning styles*. The ability to use or to advise others to use styles of instruction which help the special needs client to learn vocational skills and knowledge.
2. *Students' interpersonal skills*. The ability to help special needs clients improve their understanding of themselves and their relationships with others.

FIGURE 2. A Matrix of Special Needs-Related Educator Competencies

	PHASES			
DOMAINS	Assessment	Planning	Implementation	Evaluation
1. Teaching styles verus learning styles				
2. Student interpersonal skills				
3. Classroom social/educational environment				
4. Instructional physical environment				
5. Individualized education programs				
6. Curriculum design and modifications				
7. Instructional materials				
8. Special support services				
9. Parents				
10. Community resources				
11. Legislation and regulations				
12. Professional growth and development				

Adapted from Peak, L. and Brown, J. A conceptual framework and process for identifying the inservice needs of vocational educators serving special needs populations, 1980, p. 20.

3. Classroom social-educational environment. The ability to maintain a desirable social environment which will encourage special needs clients to learn.
4. Instructional physical environment. The ability to plan and organize the physical environment in which special needs clients are served.
5. Individualized education programs. The ability to provide the special training and/or services required by the client's Individualized Education Program (IEP), or whichever individualized plan is used by the respective agency.
6. Curriculum design and modifications. The ability to plan and organize the curriculum to best meet the needs of special needs clients.
7. Instructional materials. The ability to educate special needs clients with instructional materials which match the ways in which they learn most effectively.
8. Special support services. The ability to use an agency's or institution's support services (tutors, counselors, interpreters, and others) to supplement services to the special needs client.
9. Parents. The ability to effectively interact with the parents, guardians, or others related to the special needs client to better meet the client's training needs.
10. Community resources. The ability to use community resources to supplement efforts to serve special needs clients.
11. Legislative and regulations. The ability to educate special needs clients while complying with the rules and regulations which apply to those individuals.

12. Professional growth and development. The ability to develop and carry out plans to grow professionally in order to more effectively serve special needs clients.

This competency matrix represents a classification system that can be useful when categorizing and examining the broad range of competencies and activities applicable to these related agencies. The competencies identified here are believed to be common to the efforts to be pursued cooperatively by members of special education, vocational education, CETA, and vocational rehabilitation. If personnel who are trained to function within these programs are to effectively serve special needs clients, they must recognize that these clients have unique needs and that personnel in each agency must be competent at meeting such needs. Although some personnel function in specific competency domains, the collective staff resources of those agencies should address all of the competencies contained within the competency matrix in Figure 1. Thus, the matrix may serve both as an effective organizer for structuring interagency cooperative efforts and as a set of criteria for identifying the collective staff competencies needed.

FACTORS AFFECTING PERSONNEL DEVELOPMENT WHICH WILL FACILITATE OR LIMIT COOPERATVE EFFORTS

Maitlen (1980) stated her belief that the development of working relationships between CETA and the various education systems is "bound to have ups and downs (p. 1)." One of the typical "roadblocks" to interagency cooperation identified by Maitlen is that educators and CETA personnel often tend to think that the two systems are at odds with one another, and that they are so different in their structure that they simply cannot work together effectively. Although there are differences in the way the two systems are structured, potential collaborators must focus on the advantages of those differences and the belief that the systems can work together if they are willing to commit themselves to the effort. One of the first steps toward that goal is to recognize the differences in the systems which must be dealt with, including:

- Differences in the planning and funding cycles,
- Differences in the start-up times of the two systems (schools are on school years, CETA is on a fiscal year, and the real world is on a calendar year!)
- Differences in procurement systems,
- Differences in accounting, monitoring, and evaluation systems, and priorities,
- Differences in pay structures and tenure (of clients), and
- Differences in the scope of target populations (CETA deals with a portion of education's total population) (Maitlen, 1980, p. 6).

Intriligator (1978) stated that organizations, when conceived of as social systems (i.e, agencies and institutions), must necessarily exchange resources and interact with other systems in their external environment. These interactions may be initiated by the organization, be imposed by forces within the environment, or by the result of joint planning efforts by a specific agency or other organizations within its environment. As the study of organizations has matured, Intriligator feels the systems approach has focused attention on the tendency with which an agency interfaces with the other agencies/institutions in its environment. Leavitt, Pinfield, and Webb (1974) state that within this context the organization and its members behave:

> "... alternatively [as] recipients of environmental pressures and active modifiers of their society. Self-directing systems must adjust both temporarily to external contingencies and reorganize themselves on a more permanent basis to deal with changed environments. They have to ride with the punches and learn how to counteract (p. xix)."

CHANGES NEEDED WITHIN HIGHER EDUCATION

It cannot be stated too often or too strongly, that although these four agencies serve populations with slight differences in characteristics, they seek similar outcomes. Several of these agencies have personnel who perform similar jobs and even have similar job titles. The major differences are in the treatment of individuals through specific methods that optimize their vocational opportunities. Such organizations can interact in ways characteristic of a symbiotic consortium (Chin, 1974). This type of organization is one where agencies share services which are complamentary to each other. This framework adheres to two fundamental principles. First, each agency is seen as being the best single agency to serve their particular clientele. Second, the continuity of services to the individual will be best achieved as a result of each agency providing the majority of services to meet the client's needs within their own agency and only after they exhaust their resources, or acknowledge their limitations, would the client be referred to any of the other outside agencies. Based on these two principles, the needs of these agencies appear to be best served through a continuity model of services (Shorr & Natting, 1977).

Role of Higher Education

Higher education institutions hold an important role in the future development of collaborative services and agreements since they can prepare staff members to transition into these new and demanding roles which have been thrust upon them. Basic policy and practice changes at the local levels will require a degree of change in higher education as well. This fact is evident since the staff from these local agencies require, for the most part, at least a baccalaureate degree. Thus, colleges and universities will need to develop training programs for pre- and inservice personnel directed at examining the basic service components of each of these agencies. An additional concern which must be considered in the province of higher education is the efficient use of existing programs while not overburdening faculty with major demands in new subject areas or the accommodation of large numbers of new enrollees. The following two examples might be employed in college and university programs, each based on preparing different numbers of qualified staff for local agencies.

All participants. One alternative would be to expose every enrollee in special education, vocational education, and vocational rehabilitation to specific course content and methods relating to each of the others, as well as to CETA's areas of expertise. Such a course could be offered at either the pre- or inservice level. Instructors for such a course(s) would be drawn from already existing college or university programs and local CETA administrative staff. While this would facilitate the preparation of individuals with critical skills to be applicable in any location of any state, several problems are inherent in this model which are elaborated as follows.

1. Availability of trained personnel. One major problem is the limited availability of personnel trained in all four discipline areas. Not all higher education institutions may have programs in special education and vocational education and fewer may offer vocational rehabilitation programs. In addition, the availability of qualified instructors released from other class responsibilities to teach a new course may further limit the use of this model.

2. Mandating licensure. Most teaching certificates specify minimum courses to be taken for state licensure requirements. Interagency collaborative strategies may not be of high priority for many trainees or existing staff members, despite the fact that the future may require these skills just as there is a developing demand for computer literacy. Thus, in order to prepare individuals for future responsibilities, such a course may be mandated at a state level through a certification department, or mandated within each educational institution of higher learning as required to complete programs for certification. Either of which would require additional agreements among still other agencies that have not been generally collaborative in the past (i.e., higher education and CETA).

3. Organized resistance at the local level. One potential problem to consider seriously would be local opposition to a new, mandated requirement such as the above suggestion. This opposition might be even more reactive since more than one group is involved. Furthermore, in the area of special education, many practicing teachers at the preschool and elementary levels of education could justifiably complain that such training would be useless for their professional development.

Selective participants. An alternative route to follow, potentially leading to the same destination, is to train selected members of each of these four agencies to serve in specialized roles. With this approach the individual would be responsible for acquiring knowledge about each discipline through course work or practicum experience. Thus, no special type of higher education programs need be developed, although this should not be dismissed outright. However, to ensure that this position will be acknowledged in the service field and programmed for in the college or university, some incentives must be developed by the state departments of education such as a special certification, an add-on endorsement, and possibly monetary incentives as well (i.e. shared reimbursement by several state agencies). It would appear that some of the problems identified above may be relieved to some degree by using this approach to personnel preparation.

1. Availability of trained personnel. While this plan would still call for college or university instructors to provide knowledge about the procedures and operations of each agency, this could conceivably be accomplished through existing courses, primarily of the introductory-administrative type. In some locales where vocational rehabilitation training staff would not be available, local vocational rehabilitation counselors might be used in a visiting professor type role to provide an introduction to their agency's processes. A similar arrangement might be made with selected CETA staff.
2. Mandating licensure. Mandating a certificate or an add-on endorsement for a few persons responsible for interagency coordination rather than for all persons within these educational disciplines would probably be more acceptable to all agencies. The use of a variety of incentives such as tuition reimbursement, special role identification, salary increments for the individual, and partial salary reimbursement through these state offices, would probably do much to recruit sufficient numbers of instructors from within these existing specialized programs to assume these new roles.

3. Organized resistance at the local level. By using a system of reimbursement and other incentives, plus the fact that such roles would be optional and that persons elect voluntarily to enter it, there may be reason to believe that less opposition would be encountered at the local level. In fact, a situation in which each agency would have its own representative, trained from their philosophical perspective, with direct ties to other service delivery staff, would tend to promote such cooperative efforts by these agencies and acceptance of those training procedures.

CONCLUSIONS

The activities discussed in this paper related to cooperation, coordination, collaboration, and linkages are relatively new endeavors for some of the four agencies that served as the basis for the discussion. Several points need to be addressed in this refrain. The first deals with an underlying, but subtle implication for change. While many factors point directly to this need, few of the authors reviewed have actually been bold enough to directly recommend it. Change is both inevitable and desirable at this point in time. Given the severe limitations on various resources of many service agencies, those persons, groups, and institutions who resist change and fail to plan for change, demonstrate to the world their limited commitment to their profession's longevity and development.

Cooperation, collaboration, coordination, and the development of linking agreements between related service agencies will require not only changes in policies and behavioral practices of each agency, but also changes in competency levels, attitudes, and behavior patterns of staff within them. Changes within staff could be accomplished through appropriate pre- or inservice training programs located in institutions of higher education. However, even this solution for problems at the local level may require changes in some college or university programs. This is a good example of a "ripple effect" in which outside forces in the environment impact upon different organizations that are peripheral to the locus of action. Forces acting in an unidirectional manner usually cause organizations to respond either positively or negatively. Resistance to the status quo may have its underpinnings in the philosophy of the individual or group but this can not be used to justify their narrow-minded pursuits at the expense of any given group of eligible clients. Planning activities which consider alternative consequences to present and future goals and activities of organizations will enhance the likelihood that these organizations will prevail over changes expected during the coming decade.

The decade of the 1980's will see continued and increased changes in most aspects of our personal and professional lives. At this time, it is not known whether programs that were established last year or last week may be eliminated at any time. However, if termination does not occur, some of these programs may be so drastically altered that little resemblance to their present form will remain. How far and how fast change can occur between related organizations is not well established. Continuing research efforts are still needed. As Intriligator (1980) has stated, it is unfortunate that most of the research on interorganizational relations is based upon basic assumptions that are, in general, well accepted but have little empirical evidence to back them up.

Three implicit assumptions of interorganization research have been identified by Aldrich (1970) and include: (a) cooperative relations are assured to be "good," since they facilitate higher organizational performance and efficient, non-duplicated use of resources; (b) cooperation among organizations will cause resources to be maximized and innovations to be developed; and (c) formalization of interorganizational research is the best way to deal with changing federal, state, and local environments. In the realm of special needs populations where several related agencies simultaneously operate, verification of these assumptions is a high priority that can no longer be ignored.

Meers (1981) recently stated his belief that our society is now at a point in time where local and state educational agencies must assume the responsibility to deliver quality education to all citizens. Until cooperative linkages are formed between noneducational human service agencies and educational agencies so that the total range of necessary services are provided to special needs individuals who need them, the needs of those individuals will not be met. Meers feels that, as inadequately served persons grow older and increase in numbers, society's problems will increase correspondingly. Thus, it would seem apparent that current and past agency practices must be examined and alternative interorganizational procedures developed in order to avoid an early retirement or untimely demise for those organizations. As Confucious said (n.d.) "If a man takes no thought about what is distant, he will find sorrow close at hand."

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Program Evaluation in CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages

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The evaluation of CETA/Vocational Education programs for special needs students/clients is an area of great complexity. This complexity is the result of legislation and regulatory mandates eminating from several sources. Although such legislation and its subsequent regulation by different offices at the national level have common elements, they vary significantly in many facets resulting in difficulty by state and local service providers to organize and evaluate their results. This paper will attempt to identify the problems of implementing, operating, and maintaining CETA/Vocational Education programs for special needs students/clients and the use of evaluation as a tool to facilitate program development and maintenance.

BACKGROUND OF LEGISLATION

The focus of this paper on CETA/vocational education, special education, and vocational rehabilitation linkages emphasizes the three separate legislative actions and regulations. When attempting to evaluate programs and effective linkages to assist handicapped individuals, consideration must be given to some of the similarities and differences which exist between the source of authority and funds for a particular program. While all of us would most likely agree that the coordination of programs from various agencies is desirable, we are mitigated in implementing some programs and linkages by discrepancies in regulation and procedure adopted to implement those regulations.

Vocational education has the lead in these areas, if only by the virtue of being the oldest, since it has been a federal priority since World War II. Vocational education originally was developed to meet the needs of our nation's industries and to train skilled workers in a variety of vocational areas. With the passage of the Vocational Amendments of 1976, new emphasis was given by P.L. 94-142 to the assistance of handicapped and disadvantaged students. This emphasis was built upon previous revisions and specifically allocated 30 percent of all vocational education funds to the handicapped and disadvantaged. Specific funds were set aside for the handicapped (10 percent, Section 110a) and for the disadvantaged (20 percent, Section 110b). Such set aside funds must be expended for programs to provide vocational services to the target population. However, these funds are computed by states on a state-wide basis. This method of computation allows for some schools to emphasize programs for non-handicapped and non-disadvantaged students without any efforts towards instruction for the handicapped and disadvantaged. This can result in services clustering in areas where administrative and local interest groups wish to emphasize programs for the handicapped. Depending then on the area in which a handicapped individual resides, vocational education programs may or may not exist.

Next to be introduced was CETA, the Comprehensive Employment and Training Act in 1973. At that time the CETA mandate was to open the door of the job market to unemployed people. CETA emphasis was placed on classroom training, work skills, and movement into a job after a limited period of CETA employment. CETA was initiated at a time of high national unemployment and was designed to provide skills to the chronically unemployed. As CETA went about its assigned task it was found that a large segment of the population was not receiving training in vocational areas as provided by the Vocational Education Act. This population was in part characterized by low ability as measured by various tests, racial and ethnic characteristics, sex and handicapping conditions. Although original CETA Regulations did not exclude handicapped individuals, they did require the same economic and employment indicators for entry as were required for the non-handicapped.

The 1979 regulations for CETA reinforced a commitment to the handicapped young adults and there are now new vocational education services available with CETA resources. With the 1979 Regulations, it is now possible for a young adult with a handicap to be considered "economically disadvantaged" as long as that individual has reached the age of 16.

Special education at the national level was revised and strengthened with the passing of P.L. 94-142. This law was a revision of previous statute (P.L. 93-380) and represented changes to further define a free and appropriate public education. Public Law 94-142 is perhaps the most restrictive in that it specifically requires procedures in the areas of program provision and parental input into the process of developing an individualized education plan. While special education under P.L. 94-142 is designed for all handicapped individuals from pre-school up to age 21 this paper will address only those students who are of secondary school ages (C.A. 14 to 21). Vocational education for the handicapped is specifically addressed in the regulations for P.L. 94-142 by the Code of Regulations.

> "Each public agency shall take steps to insure that its handicapped children have available to them the variety of educational programs and services available to

> non-handicapped children in the area served by that agency, including art, music, industrial arts, consumer and homemaking education, and vocational education.
>
> Comment. . . . Moreover, vocational education programs must be specifically designed if necessary to enable a handicapped student to benefit fully from those programs; and the set-aside funds under the Vocational Education Act of 1963, as amended by P.L. 94-482, may be used for this purpose (45 CFR 121a.305)."

As can be seen by this quotation from the Code of Federal Regulations, P.L. 94-142 is closely tied to P.L. 94-482 as it relates to provision of vocational education for handicapped individuals.

One final law must be considered for closure to the background of this paper. Public Law 93-112 which governs the provision of vocational rehabilitation services to the handicapped, must also be considered in relation to its impact on linkages between CETA/vocational education and special education. The Rehabilitation Services Administration with its state counterpart should be a partner in the provision of services to handicapped individuals. While vocational rehabilitation has no direct responsibility for a student while in school, they have an interest in the success of that individual in the program. Should the individual fail the program and be placed only to quit or be fired from the job, then it will likely be the vocational rehabilitation commission in the state who will be requested to provide additional vocational training to the individual to make him/her employable. To this end, the vocational rehabilitation agency in each state should be a part of the plan development process to assure that the expertise and knowledge of the employers and their expectations are considered in the vocational training. For the vocational rehabiltation agency, the input to assure that the individual is successfully placed is critical, so that services need not be provided at a later date. To get the training done correctly and avoid the failure at a later date are both psychologically desirable for the individual and fiscally desirable for the agency.

REGULATORY OVERLAP AND ITS PROBLEMS FOR EVALUATION

Evaluation of programs in concert with the regulatory authority is accomplished with relative ease. However, when evaluation is attempted of programs combining several independent laws and sets of regulations, certain accommodations must be made. Prior to specifying some of those accommodations, it is helpful to understand the complexity of combined programming introduced by varying regulations. Figure 1 sets side by side the definitions of handicapped from P.L. 94-142 and the definitions of disadvantaged from P.L. 94-482. Specifically, notice the definition of learning disabled under 94-142 and the definition of "academic disadvantage" under 94-482.

"Learning disabilities" is defined as "imperfect ability to listen, think, speak, read, write, spell, or to do mathematical calculations." "Academic disadvantage" is defined as "(1) Lacks reading and writing skills, (2) Lacks mathematical skills, or (3) Performs below grade level." These two definitions are nearly identical. However, they are separate and distinct in funding allocations based on a difference in populations. Evaluators must be aware that in making determinations about programs the allowable individual may be either handicapped or disadvantaged depending on the definition used under the applicable law.

The development of linkages between CETA/vocational education, special education, and vocational rehabilitation have within them many distinct advantages. These advantages are sufficiently large that they offset the problems of evaluation which come with the inter-mingling of

FIGURE 1

Definitions of Handicapped and Disadvantaged

P.L. 94-142
SPECIAL EDUCATION

"Seriously emotionally disturbed" is defined as follows:

1. The term means a condition exhibiting one or more of the following characteristics over a long period of time and to a marked degree, which adversely affects educational performance:

   a. An inability to learn which cannot be explained by intellectual, sensory, or health factors;

   b. An inability to build or maintain satisfactory interpersonal relationships with peers and teachers;

   c. Inappropriate types of behavior or feelings under normal circumstances;

   d. A general pervasive mood of unhappiness or depression; or

   e. A tendency to develop physical symptoms or fears associated with personal or school problems.

2. The term includes children who are schizophrenic or autistic. The term does not include children who are social maladjusted, unless it is determined that they are seriously emotionally disturbed.

"Specific learning disability" means a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which may manifest itself in an imperfect ability to listen, think, speak, read, write, spell, or to do mathematical calculations. The term includes such conditions as perceptual

P.L. 94-482
VOCATIONAL EDUCATION

1. The term "disadvantaged" means persons (other than handicapped persons) who:

   a. Have academic or economic disadvantages; and

   b. Require special services, assistance, or programs in order to enable them to succeed in vocational education programs (Sec. 195(16);20U.S.C.2461).

2. "Academic disadvantage," for the purposes of this definition of "disadvantaged," means that a person:

   a. Lacks reading and writing skills;

   b. Lacks mathematical skills; or

   c. Performs below grade level.

3. "Economic disadvantage," for the purposes of this definition of "disadvantaged," means:

   a. Family income is at or below national poverty level;

   b. Participant or parent(s) or guardian of the participant is unemployed;

   c. Participant or parent of participant is recipient of public assistance; or

   d. Participant is institutionalized or under state guardianship (Implements Sec.140;2U.S.C.2370).

handicaps, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia. The term also does not include children who have learning problems which are primarily the result of visual, hearing, or motor handicaps, of mental retardation, or of environmental, cultural, or economic disadvantage.

4. Eligibility for participation in the special programs supported under 104:801 is limited to persons who (because of academic or economic disadvantage):

  a. Do not have, at the time of entrance into a vocational education program, the prerequisites for success in the program; or who

  b. Are enrolled in a vocational education program but require supportive services or special programs to enable them to meet the requirements for the program that are established by the state or the local educational agency.

diverse regulatory requirements which make evaluation difficult. Each of these four service providers possess similar requirements for a plan to meet the individual needs of the student/client. Each agency develops an individual plan. Each agency also has the basis of an inter-disciplinary team to develop the plan. While again there are subtle differences, some evaluators may wish to key in on evaluation of the program from this common element. Evaluation of the program by quantifying the number of students/clients who successfully meet all of their objectives is a viable method of determining that the program is offering services which are meaningful. Figure 2 shows the individual plans and their main foci.

Each agency has similar aims, and although there are differences in the terms and content, the plans are all individual and constructed in equivalent styles. Linkages between these agencies have as their strongest bond the commonality of their plans for the individual student/client.

FIGURE 2

Agencies' Individual Plans and General Objectives

AGENCY	INDIVIDUAL PLAN	GENERAL OBJECTIVES
CETA	Employability Development Plan (EDP)	1. Assess readiness for employment. 2. States barriers to employment. 3. States training needs and how they can be met. 4. Specifies plan for placement in unsubsidized employment.
Vocational Education	Individual Vocational Education Plan (IVEP)	1. Assessment of occupational area. 2. Specifies skills necessary. 3. Sets goals for training.
Special Education	Individual Educational Plan (IEP)	1. States goals for learning. 2. Specifies curriculum, materials, teacher, and outcomes. 3. May in the case of industrial arts or occupational education, specify training in shop.
Vocational Rehabilitation	Individual Written Rehabilitation Plan (IWRP)	1. States vocational rehabilitation goals. 2. Specifies objectives and services. 3. Specifies timelines. 4. Establishes employability.

COORDINATING CETA/VOCATIONAL EDUCATION, SPECIAL EDUCATION, AND VOCATIONAL REHABILITATION PROGRAMS

With the federal emphasis on interagency coordination and cooperation, there are many interagency agreements which address the combined efforts to develop successful programs for the handicapped young adult.

Most such agreements are difficult to develop since the state directors of CETA, vocational education, and special education are dealing with the lack of agreement between the laws and regulations. Many agreements have been put into effect in a number of states with considerable efforts by the people to get agencies to agree. While this laudible effort has achieved agreement in principle, it has not assisted many local agencies to implement programs at the local level. Such programs which are innovative and serve a large number of handicapped are usually the result of enlightened efforts in a particular locality. These programs are not generally available on a state-wide basis. For the state agency, this presents some particular problems which will be addressed later in this paper.

The interagency agreements are only steps which allow change. They do not bring change in and of themselves. Often such agreements are reached at the Commissioner and Assistant Commissioner levels and are not understood or supported at the regional office or local office levels. Considerable effort continues to be required to get agencies at the regional and local levels to agree on the implementation of agreements. This problem is frequently evident in the forms of lack of time allotment to staff to attend meetings required to coordinate the services, and linking the efforts of several agencies to the plan for the individual.

The effective evaluation can illicit to bear some of these concerns on the problems of implementation of the interagency agreement. The critical element in development and maintenance linkages between the agencies is the coordination at the local level; that is, the cooperation of the case workers at the local level on the development of the individual plan. For CETA, vocational education, and special education to link services, it is necessary for these agencies to have representatives who meet regarding

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the handicapped individual and participate in developing the general and specific objectives of the individual plan. This plan may be called the EDP, IVEP, IEP, or IWRP, and may be delivered by one agency or a combination of the agencies. What is important is that each agency which is linking to provide services, has a representative at the multi-disciplined team meeting to participate, comment, and help guide the development of the plan. Once the plan is developed it will be representative of the agencies present. If a change of agencies does occur during the plan, there is ample coordination to assure the individual will not be lost between the "cracks" in the provision of services.

Evaluation, if centered on the success of the individual in his/her attainment of goals, can document the success of the program by the individual receiving service. Current federal guidelines for evaluation of federal projects are not built in this capacity, but can be modified as to permit this type of evaluation.

EVALUATION METHODS

Evaluation of educational programs need to be considered in light of their intended use. This concept applies regardless of the origin of the program being CETA, vocational education, special education, or vocational rehabilitation. The role of evaluation may be many things...

> "it may form part of a teacher training activity, of the process of curriculum development, of a field experiment connected with the improvement of learning theory, of an investigation preliminary to a decision about purchase or rejection of materials; it may be data-gathering, supporting a request for tax increases or research support, or a preliminary to reward or punishment of people in an executive training program, a prison, or a classroom. Failure to make this rather obvious distinction between the roles and goals of evaluation, not necessarily in this terminology, is one of the factors that has led to the dilution of the process of evaluation to the point where it can no longer serve as a basis for answering the questions which are its goal (Scriven; 1964)."

In the evaluation of program linkages it is important to identify the purpose of the information being gathered. If the program is being evaluated on the basis of the number of handicapped students who graduate and find successful employment, then data on individual students achieving educational goals may be appropriate. If the purpose is to document the cost-effectiveness of the program, it may be necessary to gather different or additional information. If the purpose is to meet federal program requirements for evaluation, still different information needs to be gathered. The federal requirements to receive funding under P.L. 94-142 are expressed in the USOE/BEH, P.L. 89-313, and Part B Administrative Manual, V-B-1. CETA/vocational education, special education, and vocational rehabilitation linkages using this funding should attempt to deal with the criteria set forth in this manual. Such requirements create the context for the programs and the evaluation of programs. By general categories the following information is required for P.L. 94-142 funded programs:

1. Special Education Services
2. Child-centered Objectives
3. Size, Scope, and Quality
4. Coordination with Local, State, and Other Federal Efforts
5. Evaluation
6. Dissemination and Reporting

Projects that are funded with P.L. 94-142 money and provide direct services to students must be evaluated in terms of the impact of such services on the educational achievement of the students served, and other major project objectives.

The same USOE/BEH Manual also states:

Importance of Evaluation:

> "Essential to every project is the process of appraising what is happening or has happened as a result of the expenditures of effort and money. Evaluation is important to those who conduct the project as a part of their ongoing efforts to achieve their goals and to keep educators and members of the community appraised of educational developments."
>
> "Into each instructional hour of each project there must be built a critical self-evaluation of how that segment of the project contributed to the overriding project objectives of meeting educational needs of handicapped children. Much of this evaluation may be subjective in nature, some may be fragmentary, some may be intuitive based on only slight observable change in student behavior, but all such assessment should be considered and allowed to contribute to continued direction of the project activities."
>
> "Evaluation is an ongoing process, done periodically and consistently if a cause-effect relationship is to be identified between what the teacher does and how the student responds. Evaluation reinforces good teaching by identifying what teaching procedures and materials yield the greatest benefits. The greatest beneficiaries of effective evaluation are therefore the teachers and students concerned."

Method of Evaluation:

> "Methods and procedures to be used in evaluating each project in terms of its stated objectives and of its impact on the educational achievement of participating handicapped children shall be described in detail in an application. Project funds should not be used extensively for the development of new test instruments where none are available. It is appropriate to use subjective data based on carefully collected records and descriptions when objective data are not available."

The evaluation usefulness depends on knowledge of the uses of the summary, the skills of the individual(s) gathering the data, and producing the report. There are three common ways to conduct an evaluation:

1. The procurement of an independent evaluator.
2. Evaluation by the project director or administrator.
3. A staff person from the project who works under the direction of the project director.

While all three ways can produce the desired evaluation, there are obvious benefits depending on the project and other concerns; such as, community and the amount of funds involved. Probably the most useful type of evaluation is that which is ongoing and helpful to the staff and students in the project. A formative evaluation at or near the mid-point of the project is useful. The evaluator in a vocational training program for handicapped students can be a great asset in that he/she brings in a view of the project uncluttered by inbred feelings born of desires to see this project in a most positive light. The independent evaluator can assist in fine tuning a vocational training project.

STATE-WIDE EVALUATION SYSTEMS AND EFFORTS

Most states have standards for evaluating the delivery of services to students. The methods vary, and in most cases have been developed within one agency to answer its needs to document efforts for achieving its goals. In Massachusetts there does not exist a state-wide evaluation system capable of evaluating all programs which could be conducted through linkages with CETA/vocational education, special education, and vocational rehabilitation. These agencies do have to varying degrees, systems of evaluation.

However, the Department of Education, Division of Special Education, has developed an extensive system for the monitoring and evaluation of service delivery to handicapped children under the Massachusetts Law, Chapter 766 and P.L. 94-142. This system uses two major tools: a Program Audit and a Compliance Review. Both tools were developed by the Department with the need to monitor and evaluate special education but not vocational training.

The Program Audit involves extensive effort including (1) a self evaluation by the school system, (2) a review of randomly selected files, and (3) an on-site visit to conduct interviews with a number of participants in the educational process including parents. The Program Audit does look at some vocational training plans, but only in the context of the special education component. The Program Audit tool uses a team of people from other school systems to conduct the on-site interviews. Program Audit is valuable and informative, but it is also expensive and time-consuming. Presently, many school systems in the Commonwealth of Massachusetts have received a Program Audit, and in the future nearly all of the school systems will be audited.

The Compliance Review involves nearly the same elements. However, the on-site visit is conducted by state department personnel, and many of the assessments are more limited in their scope. Eighty percent of all the school systems in Massachusetts have received either a Compliance Review or a Program Audit since the implementation of Chapter 766 in September of 1974.

State evaluation systems are difficult to establish and control quality since they must address so many variations in local school systems. A team to evaluate a program in a small city may be quite capable of producing a viable report, while the same team in a larger city may be inadequate for the task.

Another major problem for state wide evaluation of CETA/vocational education, special education, and vocational rehabilitation linkages is the very diversity of the regulations and overlap of responsibilities in different languages. The potential for a state-wide system to overcome these problems and address the variance in local systems on a fair and equitable basis is not great. Such a state-wide system is also likely to have the problem of emphasizing process issues over substantive program issues of service delivery.

Local evaluation efforts are likely to be more meaningful and acceptable to all the agencies involved if agreement can be reached on an evaluation method emphasizing the individual service plan. Emphasis in this area by the four agencies will increase the efficiency of program evaluation.

STRATEGIES AND INFORMATION SOURCES FOR LOCAL AND STATE LEVEL PROGRAM EVALUATION

Given that each agency will accept a program evaluation based on the individual service plan, the formulation of a state-wide evaluation system should be able to be developed. The information source would be the vocational training agency, regardless of the federal mandate under which it operates. Such information as it relates to individual service plans could be collected which would form the basis for making judgments about the program. The following is a list of suggested types of information which could be collected:

1. Number of successful completers from a specific training program (auto repair, commercial art, and others).
2. Number of successful completers from a specific training program by handicapping condition.
3. Cost per client of training.
4. Number of successful completers who remain in employment by handicapping condition.
5. Number of applicants who were not served due to space and other limitations.
6. Number of student/clients who failed to achieve their individual service plan.
7. Number of student/clients who were re-assessed.

As this type of information is gathered at the local and state levels, it can provide a basis on which to make decisions for program options which are successful and not successful. This can then form the basis on which to make decisions on establishment of additional training sites.

The ability to provide training services and evaluate them effectively can only happen when the four independent agencies agree that they want this to happen. Issues of turfdom and bureaucracies impede effective evaluation from the standpoint of the system as a whole. Linkages are necessary and profitable for the student/client. However, for evaluations to be acceptable to all agencies and used for common purposes, they must have support and mutual elements which are capable of analysis.

State-wide analysis must be based on local evaluation and control, with common elements of the evaluation being prescribed by the state. State-wide evaluations conducted by the state are not feasible based on the divergence of regulatory authority and the cost of implementing a reasonable and effective evaluation system.

RECOMMENDATIONS FOR STATE LEVEL POLICIES ON PROGRAM EVALUATION

Program evaluation in the complex structure of the four independent service areas of CETA, vocational education, special education, and vocational rehabilitation can be accomplished by obtaining information from the Individual Service Plan of each agency. The recommendations for state level policies of program evaluation include:

1. State level interagency agreements need to be continued and refined.

2. State level interagency agreements need to involve more regional and local office personnel at the developmental stage.

3. State level interagency agreements need to address the specifics of evaluations and how such evaluations will be used to determine future program development.

4. State agencies need to foster linkages between programs at the local level, even if agreements have not been formalized at the state level.

5. State agencies should produce a combined policy statement on program evaluation which transcends each agency's own needs for evaluation.

6. CETA/vocational education, special education, and vocational rehabilitation linkages must be supported where possible in any combination.

State agencies are aware of the need for agreement and mutual coordination. What is needed now is implementation of linkages to take advantage of dwindling fiscal resources in the face of increased demands for services.

RECOMMENDATIONS FOR CHANGE IN FEDERAL PROGRAM EVALUATION REQUIREMENTS

Federal program evaluation requirements are aimed at a number of concerns which relate to monitoring of federal funds for programs as well as some quality issues. Emphasis on federal program evaluation requirements must be re-focused on the quality issues of service delivery at the local level. The main problem of linkages between the agencies discussed here is the diversity of the legislation and the regulations promulgated to enforce the legislation. Federal rulemakers should establish common definitions, procedures, and due process concerns which all agencies could follow. This would allow the state agencies to have a common method of dealing with service delivery issues which would not emphasize such divergent requirements. State agencies have been responsive to federal direction for coordinating services. The constraints they face, however, emanate from the very source of the direction to coordinate their efforts. It makes good sense for the federal rulemakers to come up with coordinated regulations which have two major parts: (1) a part which addresses common definitions, procedures, and due process concerns that would apply to CETA/ vocational education, special education, and vocational rehabilitation linkage programs and would be the same for each agency, and (2) a part which could address a necessarily different focus, such as, ages of those to be served, financial flow, specialized services, and target priority populations.

If such a system can eventually be implemented it would simplify the evaluation of programs which are linked together. Such programs will continue to function even without a coordinated movement at the national level. However, assistance from the federal rulemakers would help facilitate linkages and effective program delivery.

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Program Improvement and Research Needs of CETA, Vocational Education, Special Education, and Vocational Rehabilitation

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The November 1980 Presidential and Congressional elections produced what, at least for now, is being interpreted as an unequivocal shift in public sentiment favoring a more constrained federal government presence. On a more subtle level, some are also interpreting the elections as a mandate for restricting the role that public policy might play in reducing poverty and in assuming a role of helping those individuals who because of physical and emotional disabilities, have difficulty becoming economically self-sufficient. These trends, together with earlier state and local measures restricting taxes (and spending), have a discouraging effect on human resource development programs and institutions.

The programs are not as demonstrably effective as other kinds of government interventions, and many have only a narrow political constituency. Even the best human service programs have difficulty in definitively demonstrating effectiveness because of the multitude of nonprogram factors influencing program participants. Moreover, some programs by design, serve only a small spectrum of the population. In the end, both of these attributes make the programs more politically vulnerable.

However, human resource development policy makers, administrators, and line practitioners should resist the temptation to let the current crises dictate longer term agendas. Over the last few years, a number of priorities have been emerging in the human resource development field. The priorities which have reflected cumulative development--progress--based on general experience, evaluations, and research. This paper suggests first, what some of the research priorities in the human resource development area should not be, and then goes into suggesting the kind of research and evaluation agenda that should occur, and what shape further program development should take.

PRETEXT AND PURPOSE: THE DANGER OF "POLICY RELEVANCE"

There has been a quiet revolution in the evaluation research community's prevailing attitude about how helpful evaluators should be to users, whether they are national policymakers or classroom instructors. Much of the energy that went into a pursuit of methodological rigor has been diverted by a growing willingness to make reasonable compromises for the sake of making evaluations timely and responsive to particular questions that decision makers may have. This change in thinking is due in part to the recognition that even the most rigorous evaluations add only marginally to the understanding and knowledge of decisionmakers. Either real-life has confounded sophisticated methodologies, producing ambiguous results, or rigorous approaches have produced definitive findings--that only confirmed conventional wisdom. But evaluation also has been forced out of the ivory tower by the need for a market. Too many evaluations have wound up "on the shelf" for the evaluation community to be able to afford to keep distance, avoid contamination, and prevent interaction between themselves and those who are evaluated. However, as evaluators recognize the need to make their work relevant, those who evaluate human resource development programs, or request that it be done, should begin recognizing a new constraint on their work. After spending years trying to cultivate an audience among policymakers, those responsible for evaluation must now recognize when evaluation is likely to be a useless exercise.

As long as national policymakers are confident they have a mandate to curtail the role of the federal government, and the role of government in general in providing human service programs, no amount of evaluations will change that thinking. Unless their confidence in the mandate changes or they see voters changing their minds, human resource development programs are a low priority. Moreover, evaluations will not appreciably change public perceptions. Therefore, to the extent those politicians view the last election as a public rejection of the increasing role that government has taken in providing human services, whether that perception is correct or not, no amount of objective evidence, no matter how convincing, will change the minds of those in the position to make and implement policy. That would require them, for their own political safety, to convince the public that the programs are working, and try to mold public opinion rather than responding to it.

In this climate, CETA, vocational education, special education, and vocational rehabilitation policymakers cannot succumb to the temptation to devote evaluations and research resources to documenting the worth of their programs. Rather, those resources need to go into answering more basic and practical questions, such as: who benefits most from job training, what can high schools best teach and what can postsecondary vocational institutions best teach, or how can sheltered workshops be managed in such a way as to protect the workers in them as well as to maximize workers' potential?

These kinds of evaluations ignore the question that is frequently asked today: Do programs work? However, the answer is currently unimportant for policymakers. Regardless of the issue, policymakers want government to limit its role. The real question is not "Do programs work?" The real question is "Do we want the federal government involved in these programs, no matter how good they are?" If the current federal policies of reallocating federal dollars without regard to evidence of cost-effectiveness are any indication, it is apparent that even the most compelling piece of research or evaluative evidence would change nothing.

Regardless of what becomes of the federal role, however, there will be human resource development agencies very much in need of guidance. However, their questions will not be what should be done, or whether it should be done, but how it should be done.

The need for evaluation and research then, is a need to provide guidance on improving existing programs and fine-tuning recent new initiatives. This means a greater orientation to the needs of practitioners and program clients themselves.

WHAT IMPROVEMENTS NEED TO BE MADE?

The prospects for lean fiscal resources over the next few years provide perhaps the most compelling incentive for adapting new ideas in the hopes of improving the various activities in place. Change may be a paradoxical prescription when retrenchment seems to be the order of the day. But amidst the attack under which many public institutions find themselves, the ability to change may be the only virtue standing between long term survival and extinction.

Fortunately, although resource constraints may limit the extent of certain changes, policymakers and practitioners alike do not suffer from a shortage of ideas for innovation. The Youth Employment and Demonstration Project Act of 1977 (YEDPA) was enacted to authorize a range of employment and training related programs for young adults. Some programs were intended for youth typically served under the comprehensive Employment and Training Act, by vocational education, special education, or even vocational rehabilitation. Taken together, the various activities under YEDPA were intended to test different approaches to meeting the employability needs of young people. In fact, YEDPA has become a watershed for experiments, demonstrations, and other evaluation and research findings that have implications for all aspects of human resource development programs, for both youths and adults. There have been evaluations and research in other non-employment related areas, albeit on a smaller scale, particularly efforts to evaluate vocational education. However, the YEDPA research and evaluations deserve special examination because of their cross-institutional implications.

Joint Programming

YEDPA did not introduce the idea of joint programming to the human service delivery arena. Indeed, collaboration among institutions serving similar client groups, or providing related services, has been encouraged under federal employment and training, national education, compensatory education, and rehabilitation legislation as a means for providing more comprehensive services and reducing the cost of needless duplication. As worthy a goal as joint programming may be, it has been achieved rarely. Collaboration has flourished in certain communities, but as the product of local good will and initiative. Where that has been lacking, the time and communication needed to make it effective has sometimes not made the effort worthwhile. Turf battles have erupted over questioned authority over joint programs, divergent laws, regulations, and goals under which different institutions operate.

Under YEDPA, however, both the employment and training institutions and the educational institutions were encouraged and paid to support joint programming. YEDPA required that a minimum fixed portion of all local dollars be spent under the terms of agreements negotiated between local schools and the CETA sponsors.

The YEDPA joint programming mandate made sense since the schools (vocational education and public education alike) and the employment and training institutions served youth. Both, in one form or another, contributed to their employability. However, there were barriers. Planning and budget cycles were not synchronized. There were disagreements over what kinds of program experience deserved academic credit, and what were appropriate staff qualifications. The impediments and benefits of joint programming have become readily apparent. Where joint programming has worked, it has produced more comprehensive services for the young adults being served, created better articulation between education and employment, reduced drop out rates, contributed to the creation of effective alternatives to traditional education, and produced changes in the way in which the larger student body population in traditional schools has been served.

If the human resource development community is to capitalize on the YEDPA experience, collaborative action should proceed along three lines. First, research is needed to help establish readily usable criteria for determining whether joint programming would be useful. As helpful as the YEDPA experience with collaboration has been, there is enough anecdotal evidence to indicate that collaboration among institutions in certain settings is not needed. Administrators need to be able to make an informed judgment in advance about whether it would be appropriate for them.

Second, in the cases where collaboration seems appropriate, institutions need both guidance and support from higher authorities in negotiating joint programming arrangements. The barriers to joint programming are well documented. What is not so well documented is how those obstacles can be circumvented. Indeed, there is ample evidence that certain impediments themselves hold the solutions. The U.S. Congress, for example, could improve prospects immediately by adopting multi-year funding for CETA just as it has for education programs. State education agencies could settle local debates over academic credit for alternative educational experience by posing some responsible options. But in other cases such as differences over staff credentials, more serious thought is needed before remedies can be developed.

New Services vs. Reallocation of Existing Services

A matter very much related to the issue of joint programming is the question of how service combines change with joint programming, or other "program improvements." Program changes can take two forms. One is to reallocate existing services by changing the access that different subgroups in the populations have to those services. The second is to create new kinds of services, which may then be allocated according to rules governing allocation of pre-existing services.

Reallocation of existing services has been one form of change favored by what have been traditionally seen as antipoverty programs. Federal employment and training legislation and fedreal tuition support measures have sought to reduce poverty by increasing the access of the poor to the kind of job training skills and educational opportunities already available to others who can afford them. The rationale has been that access to job training and education will increase employability and earning power. Another assumption has been that poverty, and not a lack of readiness is the barrier to access.

The second kind of change, creation of new kinds of services, rests on a different set of assumptions. Programs targeted for this kind of change are focused on providing services different from what is usually available, and to the particular needs of the population served. The needs go beyond simple economic criteria. Vocational rehabilitation and compensatory education programs both recognize that all the access in the world will not help certain individuals because they have needs more acute than and different from most others, or at least from those whom "mainstream" institutions can serve.

Program changes do not and should not always fall neatly into one kind of change or the other. But the dichotomy between the reallocation of existing services and the creation of new services is a useful concept for assessing program improvements, and it suggests criteria for judging the usefulness of collaborative arrangements in particular. The two objectives are not necessarily mutually exclusive. However, when both are present, there is a danger of conflict. The two objectives can guide the way proposed improvements are made by forcing decision makers to more fully consider what the proposed changes are intended to accomplish, and reducing the dimensions for consideration down to two.

Human resource development programs have attempted to both increase access and to provide the extra services needed by some individuals. Even an environment of fiscal restraint does not require giving one objective a higher priority over the other. However, good management, social equity, and economic efficiency will be better served to the extent program improvements, no matter what else they do, also increase access or provide new needed services.

WHAT DO THE CLIENTS THINK?

One of the distinctions made between goods and services produced in the private and public sector of the American economy is the fact that they must pass a market test in one sector but not the other. The distinction makes good rhetoric, but is not entirely true if we do not want it to be. In the private sector, the buyer is the consumer. In the public sector, the buyer is the taxpayer, and not necessarily the consumer. In any event, the consumer is almost certainly getting more than he pays for as a taxpayer, and is therefore not in the position to provide a true economic market test by determining whether he is willing to give up resources equal to the cost of public services to receive those services.

While the economic market test may not be relevant for testing the suitability of certain human resource development services, that does not mean that there should not be a test of "consumer demand" for those services, and it certainly does not mean there cannot be a test. It does mean, however, that if those responsible for making policy and delivering services in the fields of employment and training, vocational education, special education, and vocational rehabilitation are really interested in meeting the needs of their clients, they should pay more attention to what their clients are actually looking for and need. This requires that those responsible for providing human resource development services pay more attention to what the recipients of those services have to say about the services. It also requires that recipients of those services be allowed to play a role closer to the consumer in the private market, the role of evaluator. This does not mean that service recipients' preferences preempt taxpayers' preferences in deciding how much and what kind of services should be provided. It does mean, however, that the views of recipients need to be incorporated into the ongoing process by which services are designed, developed, and evaluated.

Involving clients in an active role is a difficult task, but it certainly is not unattainable. To be done right, two kinds of changes need to take place. First, there has to be receptivity in the human resource development community to an active client role. Second, effective vehicles need to be developed for client involvement in the service design, development, and evaluation process.

One problem in achieving greater client involvement is the chicken-and-the-egg dilemma. There is some resistance among human resource development professionals to give clients too large a say in what service they receive. Some of this is natural bureaucratic self-interest, and a desire to preserve the mystique of professionalism--an instinct not unique to the human service field. However, at least part of the resistance to greater client involvement is a healthy skepticism about whether effective vehicles for clients involvement exist, or whether clients even want to be involved. The dilemma then, is which comes first, a more receptive attitude on the part of professionals to a greater client say in what happens, or some proven models of client involvement. In all likelihood, greater client involvement will require an interactive process of simultaneously changing attitudes, and trial and error with different models.

Although the Department of Labor's Youth Programs which began in 1977, may not immediately change attitudes among service delivery professionals, they at least provide ideas for determining what form effective models for client involvement might take. Private, non-profit intermediaries that have managed some of the U.S. Department of Labor's demonstration programs have found some workable approaches to giving young adults a role that is more than as simply the recipients of services. Youthwork, Inc. has found useful models for involvement in work and education programs, and in certain enterprise programs. The Corporation for Youth Enterprises has also worked on models for increasing the decision making role of young persons. Ideas based on the experiences of these intermediaries, all documented by the Department of Labor, can at least suggest models that could be adopted and work in other settings.

ENHANCING THE INVOLVEMENT OF ADVISORY COUNCILS

Genuine program improvements do not rest on greater client involvement alone. If, to paraphrase a popular piece of rhetoric, "human resource development policy is too important to be left to the human resource develoment experts," then simply increasing the say of clients is not enough to reach truly optimal service combinations and delivery strategies. Broader involvement, like that suggested in the various federal mandates for advisory councils, may also be helpful. However, fine-tuning, if not complete overhaul of the advisory council concept is needed.

The various state and local advisory councils presently required under law must establish open-ended mechanisms for participation by a range of institutions and the public at large in making policy for federally funded human resource development programs. The record of these varied advisory councils is mixed. They range from being activist bodies filling power vacuums in the established bureaucracies, to ceremonial rubberstamps. In-between are councils that have achieved good working relationships with ongoing institutions, and serve in useful advisory capacities.

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There are others that are little more than clearinghouses for serving a multitude of self-interests.

Obviously, any attempts to make improvements in the advisory process must balance the need for more careful prescription than current mandates provide, tolerance of variations in local conditions and in the involvement of various parties, and flexibility to adapt advisory council mandates to differing situations. The difficulties of balanced prescription, not withstanding, greater attention needs to be given to (1) who should be advising, (2) what kinds of decisions they should be advising on, and (3) how explicit financial and implicit institutional or turf conflicts of interest might be handled, without turning the advisory process itself into an issue. It is inevitable that any federal or state program imposing local responsibilities across the board is not going to be capable of fully achieving its objectives in every community. This implies that federal and state prescriptions on advisory councils (or any other program specificiation, for that matter) be fashioned to permit some failures, which are inevitable. To prevent failure requires a level of prescription which inhibits creative adaptation, achieves a mediocre norm, and ultimately still does not guarantee against failure.

CONCLUSIONS

The human resource development community is under its severest attack since government first entered into the business. The questions being posed now, especially at the national level, differ from past complaints about inefficiency, fraud, or abuse, by asking whether government has any responsibility for persons who cannot make it on their own. The remedies invited by past complaints were to improve client eligibility determination or assessment. The remedy implied by the tone and content of today's criticisms is the dismantlement of many human resource development programs.

While fiscal cutbacks are a fact of life for employment and training, vocational education, special education, and vocational rehabilitation in the near future, it is necessary to avoid a retrenchment mentality. Continued change is needed to fine-tune policy and improve management of programs in these areas. There is little that programs in these fields can do to make themselves "politicaly acceptable" under the concept of government that pervades national policy offices today. If that thinking persists, the long prospects for human resource development policy is bleak. The operating premise for improvement now should be that (1) rationale and common sense actions will eventually prevail and affirm a legitimate government mandate to provide a full range of human services, and (2) research, evaluation, and program improvement efforts should be focused on providing quality services.

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EPILOGUE

Linkages between CETA/Vocational Education, Special Education, and Vocational Rehabilitation are becoming more important. Effective service delivery for special needs learners is dependent upon the coordination of resources and efforts between and among these agencies. In addition, the authors have substantiated the need for and advantages of effective CETA/ Vocational Education, Special Education, and Vocational Rehabilitation Linkages. Further, several issues were identified that pertain to linkages and various recommendations were suggested:

Several issues and recommendations were discussed by Dr. Johnson relative to legislative issues concerning CETA/Vocational Education, Special Education, and Vocational Rehabilitation linkages. These issues and recommendations included:

- A National Employment Policy should be clearly articulated before the reauthorization of the Vocational Education Act and the Comprehensive Employment and Training Act. It should form the conceptual framework upon which employment preparation legislation is developed. The policy should be based on a thorough review of current and projected needs of the business and industry sector; youth and adult workers (including the handicapped and disadvantaged); and federal labor, education, and training legislation and regulations; and the strengths and weaknesses of current work preparation programs. Relationships and responsibilities among local, state and federal governments and the private sector with respect to labor force preparation should also be carefully examined.

- More emphasis needs to be focused on the local, state, and federal levels in updating work preparation personnel and curricula, exploring low cost learning environment alternatives, exploring alternatives for equipment upgrading and modernization in vocational facilities, and creating stronger links with business and industry. In addition increased attention should be focused on those occupations in which technology has or is changing the nature of jobs for which training is being provided.

- If retained as separate programs, the Vocational Education Act and the Comprehensive Employment and Training Act should be funded on the same budget cycles.

- If the present Vocational Education, Special Education, Rehabilitation, and Employment and Training legislation continue to function under separate jurisdictional authorities, the following recommendations are suggested: reexamine the philosophies and premises of each program based on future needs, communicate relevant ideas and directions for the future, give more focus to the needs of adult learners as displaced workers, allow greater flexibility for state and local governmental agencies, create standard definitions for subpopulations, expand research and development and dissemination networks, update occupational curricula and personnel, continue to increase efforts in occupational forecasting, increase incentives to state and local agencies to respond to new initiatives in the occupational clusters in their locales, significantly increase incentives for collaboration with the private sector, and increase the provisions for supportive services to those most in need.

In terms of State Planning for Linkages, Dr. Hull, et al. suggested that the following major issues should be further addressed:

- Barriers to linkages need to be removed; these barriers may include fears of agencies, lack of communication, and environmental factors.

- Incentives to linkages should be used; such as outside influence, prevailing atmosphere, and self-interest.

- Barrier removing strategies need to be included in state planning for linkages; such as, "If unable to resolve an issue that is critical to the success of coordination, do not move ahead until it is resolved. There is almost never a reason to expect that resolution will become easier in the future."

- Advisory councils should be used for establishing ongoing linkages.

- Linkages need to be written into state plans.

Regarding funding, D. Dunn cited several issues that need resolution and provided recommendations for future policy. They include:

- The Departments of Education and Labor should develop interagency agreements and identify the commonalities, roles, and responsibilities of vocational education, special education, vocational rehabilitation, and CETA.
- Vocational education, special education, rehabilitation, and CETA should have common regulations (e.g., missions, plans, and reporting requirements).
- State level multi-purpose councils should be created and have the function of coordinating services, fostering cooperation, and making the most use of categorical federal funds.
- The federal government should consider multi-year funding to promote stability of programs.
- Local funding allocations should be determined by using factors that reflect long-term client needs rather than short-term labor market conditions.

Individualized planning and coordination has become an essential component in providing comprehensive services to all special needs populations. Dr. Ganzglass offered several suggestions related to individualized planning and coordination.

- Staff development, networking, and exchange policies within agencies should be given high priority if personnel are to assume expanded roles in providing individualized instruction and services to various client populations.
- New methods such as computerization of available community resources, automation of participant or student record keeping systems, and computer-assisted guidance and instruction need to be developed for applying modern technology to make individualized planning, client tracking, and program flexibility feasible and cost-effective.
- Further investigation needs to be done in the area of developing competency-based assessment and instructional programs, particularly related to employability skill development.
- Agencies should develop interagency agreements to facilitate the sharing of client information.

- Agencies should define collaboratively, their roles and responsibilities for serving different client populations.

The preparation and retraining of CETA, vocational education, special education, and rehabilitation personnel is regarded by many people in the field to be the most important factor in delivering appropriate instruction and services to handicapped youth and adults. Dr. Brown and Mr. Kayser cited several issues and recommendations for personnel development.

- Although there are increased initiatives and resources, many service agencies and institutions resist change and do not plan for change.
- Interagency cooperation efforts will require changes in policies, roles, competency levels, and attitudes of all agency staff and could be facilitated through inservice or preservice training programs at colleges and universities.
- The legislation governing vocational education, special education, vocational rehabilitation, CETA and other private and public agencies present barriers to cooperation.
- Various differences among agencies inhibit cooperation and include: planning and funding cycles, start-up times, procurement systems, accounting, monitoring and evaluation, priorities, pay structures and tenure, and scope of target population.
- Colleges and universities need to develop training programs for inservice and preservice personnel directed at examining the basic service components of each of these agencies.
- Higher education institutions must use existing programs efficiently while not overburdening faculty and staff with major demands in new subject areas or the accommodation of large numbers of new enrollees.
- There is a limited availability of personnel trained in all four discipline areas since appropriate programs as well as qualified instructors are lacking.
- A course(s) may need to be mandated at the state level for licensure, and/or within each college or university to complete programs for certification.

- The twelve competencies in the model presented and discussed must be possessed by at least one member of the team.
- The model provides a basis for communication among agencies.
- There is a need for stability and continuous availability of services within given agencies.
- Interagency efforts typically represent a small but critical component of each of the four agencies' responsibilities and services.
- Agencies must take action toward change since personnel development will continue to be the major factor impacting future interagency efforts to serve special needs groups.
- There needs to be more focus on need for an interagency model on planning, monitoring, and evaluation.
- Legislation is too fragmented and inconsistent among the four groups to be linked.
- Future legislation should focus on prior success in each of the four agencies and build upon successes when placing additional emphasis on the training of personnel who possess overlapping and complementary competencies, thus facilitating individual and coordinated services on a continuous and hopefully improved basis.

With respect to program evaluation in CETA/vocational education, special education, and vocational rehabilitation linkages, Dr. Korn reviewed numerous problems and issues and offered several recommendations which included:

- Evaluation of CETA/vocational education, special education, and vocational rehabilitation linkage programs is inhibited by legislative and regulatory diversity.
- Evaluation of linked programs can be accomplished by using the agencies' service plan achievements as a common denominator for program evaluation.
- State agencies need to involve regional and local agency personnel in linkage agreement developments if effective assistance in evaluating linked programs is to be accomplished.

- There needs to be coordination at the federal level if linked programs are to effectively attain their goals.

The existing federal legislation provides funds which are designed for the purpose of improving present programs through research and development, curriculum development, personnel training, and dissemination activities. Dr. Wurzburg discussed several considerations for program improvement.

- Research is needed to assist in establishing usable criteria for assessing whether joint programming would be useful.
- Local agencies need both guidance and support from state and federal personnel in developing interagency cooperation and agreements.
- The reallocation of existing services and the creation of new services are two useful ways in which program improvement can be facilitated, and criteria need to be established for judging the usefulness of collaborative arrangements.
- Clients need to have an active role in program and service delivery and this can occur if the human resources community is receptive to an active client role; and there must be effective vehicles for client involvement in the service design, development, and evaluation process.
- Increased client involvement will probaly require both changing agency attitudes and the use of various proven models of client involvement.
- Advisory councils need to become more involved in the program improvement process, however, more attention needs to be focused on who should be advising, what kinds of decisions they should be advising on, and how explicit financial and implicit institutional turf conflicts of interest might be dealt with.
- Continued change is needed to improve policy and the management of programs in employment and training, vocational education, special education, and vocational rehabilitation.

The identified issues and functional recommendations will hopefully provide information that will assist in developing CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages. The issues cannot be considered an exhaustive list. However, the issues and recommendations provide considerations for planning, implementing, and evaluating CETA/Vocational Education, Special Education, and Vocational Rehabilitation Linkages.